

**Mid Devon Local Development Framework
Published Allocations and Infrastructure Development Plan Document
Sustainability Appraisal and Strategic Environmental Appraisal**

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1.0 Non Technical Summary

- 1.1 This report documents the processes of Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) for the Mid Devon Allocations and Infrastructure Development Plan Document as required by planning and European legislation and guidance. SA/SEA exists to promote more sustainable development by ensuring an ongoing assessment of the wide range of sustainability impacts of decisions during plan preparation. The Allocations and Infrastructure Development Plan Document sets out specific proposals for development and the provision of infrastructure, in line with the strategy set out in the Regional Spatial Strategy and Core Strategy.

Contents of the Development Plan Document and relationship with other plans

- 1.2 The Development Plan Document proposes land for development and proposals and policies for the provision of infrastructure, in accordance with the sustainable framework set out in the Core Strategy and emerging Regional Spatial Strategy to the year 2026. The allocations include housing, employment, retail and other key uses in sustainable locations within the district. In accordance with these strategic planning documents, development allocations are concentrated at Tiverton, Cullompton and Crediton as the most sustainable settlements, with Bampton in a supporting role. Rural allocations are proposed to meet a local need for affordable housing and some small scale employment. More general national guidance set out in Planning Policy Guidance and Statements has been followed.
- 1.3 The Mid Devon Sustainable Community Strategy was approved in 2006, and its contents were taken into account in the preparation of the Core Strategy. Accordingly, its influence has flowed through into the Development Plan Document.

The current state of Mid Devon and likely future changes

- 1.4 Mid Devon is a rural authority, with a sparse population, but close to major transport routes and set between the two growing, successful urban areas of Taunton and Exeter. These key factors colour the other environmental, social and economic characteristics of the area. About half of the 76,000 population is in the three main towns of Tiverton, Cullompton and Crediton, the remainder is found in the smaller settlements and countryside. There is a wealth of heritage interests (over 2500 Listed Buildings, 49 Ancient Monuments and 50 Conservation Areas) although nationally important wildlife sites are relatively scarce (13 Sites of Special Scientific Interest covering just 0.3% of the land area). The landscape is extremely attractive and includes a small part of the Blackdown Hills Area of Outstanding Natural Beauty, as well as adjoining both the Exmoor and Dartmoor National Parks. The key social issues revolve around the high house prices relative to local incomes, the future of the economy, which has higher proportions of manufacturing and agriculture than the country as a whole, and specific areas of poor air quality due to emissions from traffic. There is a high level of out-commuting, and high levels of use of the private car. The main settlements are close to or within the floodplains of the district's main rivers, and the future extent of flooding is a key future concern.
- 1.5 Without the preparation of this Development Plan Document, the policies and strategy of the adopted Core Strategy will provide a level of guidance for Mid Devon, but only to the extent that this does not require new allocations for development. The remaining proposals and policies of the

current Local Plan will come forward over the next 5 years or so, as well as development on “windfall” sites. However within 5 years, the lack of available housing supply will lead to approvals on unallocated Greenfield sites adjoining the market towns as a result of national planning guidance on maintaining housing supply. Housing provision may slow a little. Employment provision will fail to come forward at levels proposed in the Core Strategy, and there will be a growing imbalance between housing and employment, and increasing out-commuting. Limited retail development beyond existing commitments can be expected. Infrastructure provision is limited to relatively small scale provision such as open space, under existing policies. It is possible that public funding for one or two larger scale proposals will come forward, such as the Crediton Link Road.

- 1.6 These changes are summarised against the sustainability factors as follows:

Objective	Indicators and desired direction of change
Environment	
(A) Biodiversity, flora and nature conservation	Gradual reduction in biodiversity, as well as changes in the mix of species arising from the warming climate.
(B) Landscape	Limited change in appearance of the countryside, due to the general Core Strategy approach. The larger towns will, however, expand into adjoining urban fringe areas, initially on existing Local Plan allocations and then as a result of ad hoc planning decisions providing for housing supply.
(C) Cultural Heritage	Quality of Listed Buildings and Scheduled Monuments will remain protected, but Conservation Areas and undesignated areas will gradually lose some aspects of character through small scale changes.
Natural Resources	
(D) Water	Limited change in water quality.
(E) Land and Soils	Low proportions of brownfield land developed, and continued development of greenfield land around settlements around the district.
(F) Air Quality	Continued worsening of air quality in urban areas arising from continued traffic growth.
(G) Traffic and Transport	Little improvement to public transport services, particularly in rural areas, and a continued rise in car use for all journey types and distances. Longer distances travelled, with more commuting out of the District.
(H) Waste	Gradual increase in recycling rates, depending largely on public sector investment in collection methods.
(I) Climatic Factors	Continued increase in carbon dioxide emissions, and continued warming of the global climate. Local climatic changes become obvious, and indeed are likely to speed up. Increased flooding risk along the main rivers, including parts of Cullompton and Tiverton. Limited development in functional floodplains.
Social Issues	
(J) Healthy and Safe Living Environments	Public open space is provided with the larger housing developments, and in some rural settlements. Limited strategic investment in Green Infrastructure.
(K) Health care, community services and facilities	No increase or possibly reduction in public transport provision, particularly in rural areas. Continued decline in other rural services.
(L) Housing	Housing development occurs at approximately the rate set out in the Core Strategy, initially on Local Plan sites, later on ad hoc Greenfield releases around the main towns. Affordable housing is provided through negotiation in accordance with Local Plan policies.

(M) Consultation and Social Deprivation	Multiple deprivation is likely to remain concentrated in a few small pockets. Demands for public consultation continue to increase, with opposition to new development growing.
Economic Issues	
(N) Economic Growth	Continued growth in small businesses, subject to the prevailing economic background improving in the medium term. Limited economic development land being developed.
(O) Rural and Urban Diversification	Rural areas likely to continue slow economic growth, based on small scale scattered development. Lack of available land limits development in the towns. Main growth areas will be outside the district, particular Exeter and Taunton.
(P) Employment	Economic restructuring will reduce the availability of manufacturing, agricultural and associated employment, and there will be limited growth within other sectors. However, with the availability of jobs in nearby urban areas, out-commuting will increase, while unemployment will remain relatively low.
(Q) Retail	It is likely that there will be additional small scale retail investment in and around the town centres, based on availability of sites.
(R) Tourism	Tourist spend will continue to grow gradually.

Characteristics of the most affected areas

1.7 The areas which will be most directly affected by the Development Plan Document are the four market towns named as being most suitable for a range of development. These towns vary in size, from Tiverton (21,800 population) through Cullompton (8,500) and Crediton (7,400) to Bampton (1,700). They are all historic market towns, each with a large Conservation Area containing numbers of Listed Buildings at their heart, recognisable and busy shopping centres and a range of housing, employment and servicing commensurate with their size. However, they each have their individual character and issues. There are a number of environmental constraints associated with each, including Scheduled Monuments within them or close by, floodplains (although often behind flood defences) and some important wildlife sites such as Tidcombe Fen SSSI at Tiverton. Traffic and air quality issues are prevalent in Cullompton and Crediton, less so in Tiverton and Bampton. Not directly affected in the same way is the large area of countryside and rural settlements making up the rest of the district. The provision of affordable housing in the villages will impact on their social sustainability, and have some physical/environmental impact.

Existing sustainability problems

- 1.8 The key sustainability issues are considered to be;
- The need for housing, particularly affordable housing, in the most sustainable locations.
 - Growing levels of out-commuting.
 - The need for employment growth, particularly in the market towns.
 - 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.
- 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.
- A growing gap between need for and provision of a range of - infrastructure.

Relevant international and national objectives

- 1.9 The key objectives are those set out in the Government's Planning Policy Statements and Planning Policy Guidance, in the emerging Regional Spatial Strategy and in the adopted Mid Devon Core Strategy.

Likely significant effects of the Allocations and Infrastructure Development Plan Document

- 1.10 The sustainability appraisal of the Allocations and Infrastructure Development Plan Document found the following significant effects, when compared with the "continued trends" scenario, summarised above.

(A) Biodiversity, flora and nature conservation.	Better in the medium and long term. Allocations avoid damage to protected sites and incorporate policies and proposals to protect and enhance biodiversity. The major sites provide significant green infrastructure and cycling/walking infrastructure. The Community Infrastructure Levy or other interim policies will fund provision of green infrastructure and tree planting, with benefits for habitat and biodiversity. If strategies to reduce climate change are successful, which will require action across the world, then impact on biodiversity from that would be limited.
(B) Landscape	Better in the long term. Allocated sites for development will inevitably have some landscape impact, but is likely to be less overall than a series of ad hoc Greenfield releases over the later periods of the plan due to specific mitigation criteria, such as significant green infrastructure provision at the larger sites. Green Infrastructure investment should have wider landscape benefits. If strategies to reduce climate change are successful, which will require action across the world, then impact on landscape character from that would be reduced.
(C) Cultural Heritage	Better in the medium and long term. There is likely to be limited impact from development compared with the “no-plan” scenario, as cultural heritage would be protected through appropriate policies in both situations. Support for Cullompton town centre enhancement would benefit that town’s heritage. A reduction in traffic and improvement in air quality in areas of Crediton and Cullompton arising from transport investment should produce heritage benefits. Similarly, if development is managed appropriately, improvements to town centres can lead to investment in heritage and other visual enhancements.
(D) Water	No impact.
(E) Land and Soils	Worse in the medium and long term. Levels of Greenfield development may be slightly increased, particularly in middle to late phases of the plan, because of the policies to maintain housing supply and the avoidance of “planning by appeal”.
(F) Air Quality	Better in the medium term, much better in the long term. Significant improvements to air quality in Cullompton would arise from the strategy. Requirements for Low Emission Strategies in major developments in Tiverton and Crediton would lead to improvements in those towns.
(G) Traffic and Transport	Better in the medium term, much better in the long term. Investment in transport infrastructure, including public transport and the Cullompton relief road, would lead to significant improvements in the medium to long term. Urban extensions provide greater on-site provision than the smaller sites which would otherwise come forward. The provision of additional local employment creates the opportunity for greater proportions walking and cycling to work, and for shorter commuting distances. Increases in tourism may involve greater travel to the area, but this is likely to be at a relatively low level.
(H) Waste	No impact.

(I) Climatic Factors	Better in the medium term, much better in the long term. The policies and proposals will lead to significant reductions in carbon emissions, arising from provision of public transport and mixed use and low carbon strategies at the major developments, and from a significant increase in local employment provision in the main towns leading to reduced out-commuting. Enhancements to town centres, particularly Cullompton, should encourage greater local retail expenditure, therefore outflow of expenditure and the associated travel. Increases in tourism may involve greater travel to the area, but this is likely to be at a relatively low level.
(J) Healthy and Safe Living Environments	Better in the medium and long term. Some improvements arising from increased local employment, affordable housing and cycling/walking infrastructure. Improvements in health from the air quality measures in Cullompton and Crediton and in Tiverton an additional GP surgery would be provided. There may be health benefits associated with access to biodiversity by the population. If strategies to reduce climate change are successful, which will require action across the world, then impact on health from that would be limited.
(K) Health care, community services and facilities.	Better in the medium and long term. Some improvements arising from provision of facilities within urban extensions at Tiverton and Cullompton. Additional public transport investment will support improved access to nearby towns and cities, including Exeter. Increased rural tourism may have some beneficial effect on retention of local, particularly rural, facilities through increased local expenditure.
(L) Housing	Better in the medium and long term. Provision of higher levels of housing and greater certainty of supply. Higher levels of affordable housing in the rural areas through the allocations, and some increase in affordable housing provision through lower site thresholds.
(M) Consultation and Social Deprivation	Worse in the short term, better in the medium and long term. On balance, proposals of Development Plan Document likely to be unpopular initially, compared with unpopularity of later ad-hoc Greenfield releases. Provision of additional local employment and affordable housing should lessen deprivation in the medium to long term.
(N) Economic Growth	Better in the medium term, much better in the long term. The strategy would significantly increase economic growth in Mid Devon, the impact increasing over time.
(O) Rural and Urban Diversification.	Better in the short and medium term, much better in the long term. Rural diversification is likely to be boosted by the particular proposals at Bow and Kentisbeare, with continued rural economic development elsewhere. Diversification of the market towns' economies would be substantial. The impact of increased tourism should be beneficial in this respect, too.
(P) Employment	Better in the medium term, much better in the long term. Significant increases in local employment would arise.

(Q) Retail	Better in the medium and long term. Recent developments and commitments have provided for local retail needs in large part; some improvements to Tiverton town centre should arise from the specific allocations. Traffic relief should bring retail benefits to Cullompton town centre by improving the shopping environment and encouraging greater footfall.
(R) Tourism	Better in the medium and long term. Potential for greater tourist growth through green infrastructure provision, and through improved Cullompton town centre.

- 1.11 These effects indicate an overall improvement to sustainability arising from the implementation of the Allocations and Infrastructure Development Plan Document, when compared with a continuation of past trends. Particular benefits would arise in the long term.

Mitigation measures

- 1.12 The Allocations and Infrastructure Development Plan Document seeks to incorporate the appropriate mitigation measures necessary to maximise the social, economic and environmental benefits it can bring, and to minimise any harm. These fall broadly into general mitigation through the planning and provision of infrastructure, and specific mitigation measures assigned to particular sites. These have been incorporated as a result of considering the sustainability impacts of earlier versions of the strategy. An iterative approach to strategy development has been incorporated, starting with the Issues and Options Report, following this up with a Preferred Option, and then evolving this into the Published Development Plan Document. At each stage, amendments were introduced to improve the sustainability performance of the strategies.

Alternative strategies and how they were assessed

- 1.13 The overall strategy of the District has been set by the Core Strategy, and it is how this is to be implemented in more detail that the Allocations and Infrastructure Development Plan Document proposes. Therefore, the key choices for this Development Plan Document relates to specific site allocations, and combinations of allocations, together with proposals for infrastructure provision.
- 1.14 The Council prepared a long list of potential allocations during the initial work on the Development Plan Document, in consultation with expert bodies, and including sites promoted to the council by developers and landowners. These sites were published for consultation in Issues and Options Reports during 2007, each with a very broad indication of the likely sustainability positives and negatives, and with potential infrastructure provision.
- 1.15 For Tiverton, Cullompton and Crediton alternative strategies were considered, based on different combinations of potential allocations and infrastructure.
- 1.16 Comments on these documents were received, summarised and have helped to prepare later versions of the Development Plan Document.
- 1.17 Further assessment of sites were undertaken, including in particular the preparation of a Strategic Housing Land Availability Assessment (SHLAA) which considered whether the potentially suitable sites were available and

achievable. Additional technical work on sustainability issues was prepared by the Council and by site promoters.

- 1.18 A Preferred Options consultation, carried out in November 2008, set out the Council's emerging thinking on sites and strategies. Again, responses to this consultation were summarised and have been considered in the preparation of the published Development Plan Document.
- 1.19 All the technical work and other assessments available to the council have been used to prepare this appraisal of the proposals in the published Development Plan Document and the reasonable alternatives. Reasonable alternatives in this case include proposals considered by the Council during the preparation of the Development Plan Document which are either considered suitable, available and achievable and/or were promoted to the council during the preferred options consultation.
- 1.20 The Council has assessed the sites in two phases. Their impact was initially considered without the inclusion of specific mitigation measures. Following from this, potential mitigating measures were considered, and the sites reassessed assuming these were implemented. Appendix 1 sets out these appraisals in full.
- 1.21 Taking these appraisals into account, the council has chosen its sites and proposals for allocation, and worked these up into policies to incorporate the mitigation where possible. The policies of the published Development Plan Document reflect this process. An appraisal of the Development Plan Document proposals was then undertaken, to provide a final assessment of the impact of the Development Plan Document on the area.
- 1.22 The assessment method was based on a report prepared for the council by TEP, entitled "SA/SEA Stage A Development of Objectives, Indicators and Establishment of Baseline Data" and published in October 2004 (available from the Mid Devon website). This report was prepared for the SA/SEA of the Core Strategy, and provided a set of Sustainability Objectives and indicators, which were used to assess the alternative options contained within the Core Strategy. These objectives covered the full range of environmental media referred to in the SEA Directive, and additional objectives covering social and economic issues.
- 1.23 For the assessment of the more site specific proposals contained in the Allocations and Infrastructure Development Plan Document, these objectives were retained, but refined by the addition of impact indicators, and each potential site was assessed against these. More general policies continued to be assessed against the overall objectives, as the Core Strategy policies had been.

Monitoring

- 1.24 In order to ensure that the social, economic and environmental impacts of the Allocations and Infrastructure Development Plan Document are kept under review, a number of indicators of significant sustainability effects are chosen. These will be published annually, through the Annual Monitoring Report process, and may trigger reviews of the Development Plan.

2.0 Background

Purpose of the Sustainability Appraisal / Strategic Environmental Assessment Report

- 2.1 In accordance with the Planning and Compulsory Purchase Act 2004, Local Development Documents must be subject to Sustainability Appraisal (SA). The SA process assists Local Planning Authorities to fulfil the requirement of “contributing to the achievement of Sustainable Development” in spatial planning.
- 2.2 In preparing Local Development Documents Local Authorities must also carry out Strategic Environmental Assessment (SEA) in accordance with European and UK legislation. The UK Government has advised that an integrated approach to these two separate requirements be adopted. This involves extending the breadth of issues for SEA to cover additional social and economic aspects.
- 2.3 SA assists in promoting sustainable development through integrating sustainability considerations into plan making. It is an iterative, ongoing process and integral to plan making. SA/SEA considers the effects of the plan on the environment, people and the economy, predict the effects of reasonable alternatives, propose measures to mitigate harmful effects, and propose monitoring measures.
- 2.4 This report is the SA/SEA report required under the relevant legislation and is being published for consultation alongside the Publication of the Proposed (Regulation 27) Allocations and Infrastructure Development Plan Document.

Plan objectives and outline of contents

- 2.5 The purpose of the Allocations and Infrastructure Development Plan Document is to implement the Vision and Strategy for Mid Devon set out in the Core Strategy (adopted 2007), taking full account of the Regional Spatial Strategy (publication expected in the near future) and relevant national policies. Its purpose is to allocate land for development and set out policies and proposals for supporting infrastructure.
- 2.6 In the same way that the Development Plan Document must be read with the Core Strategy, this report must be read with that prepared for the Core Strategy.
- 2.7 The Adopted Core Strategy contains the following vision and strategy, which will therefore form that for this Development Plan Document.

Vision

Mid Devon will be a prosperous and sustainable rural district, where individuals, families and communities can flourish as a result of access to good quality local employment, housing and services and a clean, green, safe environment. Local communities and private, public and voluntary organisations will work in partnership to meet social and economic needs in ways that enhance the environment and reduce the area’s carbon footprint. High quality development in the right places will bring regeneration, social and economic benefits and enhance towns, villages and countryside while promoting sustainable use of energy and other resources and tackling the causes and effects of climate change. The Council will use planning and related powers to:

Promote community well-being

- Diverse, inclusive communities with a vibrant mix of accessible uses and local services
- Sufficient decent homes which people can afford
- Safe, healthy and crime free neighbourhoods
- Active, involved, well educated citizens

Support sustainable economic success

- A good range of jobs in urban and rural areas
- Profitable and expanding local businesses
- Attractive, lively and successful town centres
- Tourist expenditure which benefits the whole district

Conserve and enhance the area

- High quality design in new developments
- Clean air and water
- Wildlife, heritage and history is valued and protected
- Attractive countryside providing for biodiversity and employment

Respect environmental limits

- Social and environmental benefits of development are optimised
- Developments use land, energy and resources efficiently
- Waste is minimised and recycling rates are high
- Public transport, walking and cycling are encouraged
- Floodplains remain undeveloped

Overall strategy

In order to move towards achieving the vision, development will be managed to

- increase the self – sufficiency of the district as a whole and the settlements within it;
- increase growth in economic activity while reducing the provision of new housing;
- guide development to the most sustainable locations, improving the balance of housing, employment, facilities and other uses within towns, villages, neighbourhoods and rural areas;
- reduce the need to travel by car, increasing the potential of public transport, cycling and walking;
- reduce carbon emissions in support of regional and national targets; and

- promote social inclusion and reduce inequalities by enhancing access for all to employment, services and housing.

Market towns

The market towns of Tiverton, Cullompton, Crediton and Bampton will be the main focuses of new development, in scale with their individual infrastructures, economies, characters and constraints. Development will be targeted to

- provide a sustainable mix of homes, businesses, shops, leisure, health, education and many other uses, creating a balance that increases self-sufficiency, resolves existing problems where this is feasible and helps to meet rural needs;
- protect and enhance their environmental assets including their character, biodiversity, heritage, setting and air quality;
- develop underused and brownfield sites within the towns in preference to greenfield land or public open spaces; and
- enhance town centres as accessible, vital and viable locations for a vibrant mix of uses, and as public transport hubs.

Villages

A network of villages with sufficient employment, services and public transport provision will be locations for limited development, targeted to:

- provide for local need, with affordable housing, shops, local services, community facilities and low impact businesses;
- avoid significantly increased travel by car; and
- protect and enhance their environmental assets, including their character, biodiversity, heritage and setting.

Countryside

Countryside areas outside market towns and villages, including hamlets and other small settlements, will be subject to strict control over development. The emphasis will be on

- meeting agricultural needs;
- promoting environmental enhancement including landscape and biodiversity; and
- encouraging appropriate economic diversification.

2.8 The Development Plan Document contains 45 individual proposals for development of housing, employment and/or retail (usually including some elements of infrastructure such as open space) and 7 proposals for stand-alone infrastructure. The overall provision of development on these sites amounts to 7415 dwellings, 263450 square metres employment land and 4300 square metres retail provision, on sites totalling 464 hectares. These development proposals would be in addition to development completed since 2006 and existing consents at April 2009, which amounted to 2865 dwellings, 118,040 square metres of employment floorspace and 10,540 square metres of retail floorspace. Some of the housing and employment provision is either likely to occur after 2026, or is proposed on contingency

sites which will only come forward in the absence of development on other sites. Accordingly the level of development proposed by 2026 is lower than these totals imply, in general conformity with the Mid Devon Core Strategy and emerging Regional Spatial Strategy.

- 2.9 In accordance with the Core Strategy, the main location for new development will be the market towns of Tiverton, Cullompton and Crediton and the smaller market town of Bampton, with the 21 defined villages including allocations for local affordable housing needs and employment only. Two sites are proposed in the open countryside for gypsy and traveller pitches.

2.10 The following sites are proposed for development in the proposed Development Plan Document (all policy references are prefixed AL/).

Tiverton Site	Name	Area	Dwellings	Employment	Retail
TIV/1 – TIV/7	Eastern Extension	145	24000	130,000	1000
TIV/8	Farleigh Meadows	11.2	300	0	0
TIV/9	Blundells School	14	200	7000	0
TIV/10	Howden Court	6.4	65	0	0
TIV/11	Belmont Hospital	1.4	76	0	0
TIV/12	St Andrews Street	0.5	55	0	0
TIV/13	William Street	0.9	45	0	0
TIV/14	Palmerston Park	0.9	15	0	0
TIV/15	Blundells Garage	0.2	13	0	0
TIV/16	Roundhill	0.4	13	0	0
TIV/17	Hay Park	0.3	13	0	0
TIV/18	The Avenue	0.4	15	0	0
TIV/19	Phoenix Lane	0.3	0	0	2400
TIV/20	Bampton Street	0.1	0	0	900
TIV/21	Tidcombe Hall	5.0	200	0	0

Cullompton Site	Name	Area	Dwellings	Employment	Retail
CU/1 – CU/8	North West	74.8	1100	40,000	0
CU/8	Knowle Lane	12.5	340	0	0
CU/9	Court Farm	5.0	150	0	0
CU/10	Padbrook Park	0.8	30	0	0
CU/11	Exeter Road	1.4	45	0	0
CU/13	Week Farm	10.5	0	15,000	0
CU/20	Colebrooke	4.8	100	0	0

Crediton Site	Name	Area	Dwellings	Employment	Retail
CRE/1	Wellparks	18.3	185	0	0
CRE/2	Red Hill Cross	3.1	135	0	0
CRE/3	Cromwells Meadow	1.3	50	0	0
CRE/4	George Hill	1.2	25	0	0
CRE/5	The Bike Shed	0.16	10	0	0

CRE/6	Woods Group	0.17	8	0	0
CRE/7	Wellparks	1.5	0	4150	0
CRE/13	Pedlerspool	21	165	21,000	0

Bampton Site	Name	Area	Dwellings	Employment	Retail
BA/1	School Close	1.7	60	0	0
BA/2	Bourchier Close	2.4	40	4000	0
BA/3	Ashleigh Park	0.3	5	0	0
BA/4	Newton Square	0.25	5	0	0

Rural Site	Name	Area	Dwellings	Employment	Retail
GT/1	Five Bridges, Merrimeade Farm	0.5	8	0	0
BO/1	Bow, Godfrey Gardens	0.23	9	0	0
BO/2	Bow, Iter Cross	0.5	0	1700	0
BO/3	Bow, Junction Road	0.6	0	2100	0
CO/1	Copplestone, Bassetts Cl	0.4	14	0	0
CU/1	Culmstock, Linhay Cl	0.4	10	0	0
CU/2	Culmstock, Hunters Hi				
KE/1	Kentisbeare, Village Hall	0.8	20	500	0
MB/1	Morchard Bishop, Greenaway	0.3	10	0	0
SA/1	Sandford, Village Hall	0.7	10	0	0
WI/1	Willand Moor	0.3	10	0	0
WI/2	Willand, B3181	1.0	35	0	0

2.11 The major associated infrastructure proposed includes transport provision, education facilities, green infrastructure and affordable housing. The plan proposes that the Community Infrastructure Levy is implemented to fund much of this investment. The following sites are proposed for infrastructure in this Development Plan Document (all prefixed AL/).

Proposal	Infrastructure Type
CU/12	Community Uses
CU/14	Road
CU/19	Rail Station
CRE/9	Road
CRE/10	Road

CRE/11	School
CRE/12	Cemetery

2.12 The Development Plan Document also contains a number of related policies, as follows, all prefixed AL/.

Policy	Subject
DE/1	Housing plan, monitor, manage
DE/2	Overall affordable housing provision
DE/3	Affordable housing site target
DE/4	Occupation of affordable housing
DE/5	Inclusive design and layout
DE/6	Exceptions policy
DE/7	Gypsy and traveller pitches
DE/8	Public Gypsy and traveller provision
IN/1	Community Infrastructure Levy
IN/2	Development without infrastructure levy
IN/3	Public open space
IN/4	Green infrastructure
IN/5	Education provision
IN/6	Carbon footprint reduction
MO/1	Monitoring
CU/15	Cullompton air quality
CU/16	M5 Junction 28
CU/17	Town centre enhancement
CU/18	Enhanced cycling and walking routes
CRE/8	Air quality and link road

2.13 Alterations to the Adopted Proposals Map will be made to reflect these proposals.

Compliance with the Strategic Environmental Assessment Directive and Regulations

2.14 The SEA Regulations set out certain requirements for reporting the SEA process, and specifies that if an integrated appraisal is undertaken (ie SEA is subsumed within the SA process, as for the SA of this Allocations and Infrastructure Development Plan Document) then the sections of the SA report the meet the requirements set out for reporting the SEA process must be clearly signposted. Consequently, the requirements for reporting the SEA process are set out below, and the section of the report that progresses each requirement indicated.

- An outline of the contents and main objectives of the plan and the relationship with other relevant plans (Sections 2 and 4).
- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan (Section 4).
- The environmental characteristics of areas likely to be significantly affected (Section 4).
- Any existing environmental problems which are relevant to the plan including in particular those relating to any areas of particular environmental importance (Section 4).
- The environmental protection objectives relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation (Section 4).
- 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 these. These should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects (Section 7).
- The measures envisaged to prevent, reduce and as fully as possible to offset any significant effects on the environment of implementing the plan (Section 6).
- An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information (Sections 4 and 5).
- A description of the measures for monitoring (Section 8).
- A non – technical summary of the information provided under these headings (Section 1).

3.0 Methodology

- 3.1 For an explanation of the work undertaken in appraising the Core Strategy, please see the relevant sections of the Core Strategy Sustainability Appraisal/Strategic Environmental Assessment published in December 2005 and updated with an Annex on the submission of the Core Strategy. The approach to assessing social, environmental and economic impacts of development in this report will be very similar to that used then. These reports are available on the Mid Devon website www.middevon.gov.uk.
- 3.2 The sustainability objectives and framework used in the Core Strategy appraisal continue to provide a good general basis for assessing the sustainability impacts of development. However, it is considered that given the site-specific nature of the Development Plan Document, additional information on potential development sites was required. Accordingly, the objectives set out in the Core Strategy framework have been expanded by the use of “impact indicators” designed to elicit more specific impacts.
- 3.3 The appraisal methodology for potential allocations involved assessing sites in two main stages. Sites proposed for allocation and the reasonable alternatives were assessed, being all sites considered available, achievable

and potentially suitable for allocation. The total list of sites assessed therefore consisted of sites allocated in the proposed Development Plan Document, other sites considered achievable in the Strategic Housing Land Availability Assessment 2009, plus any sites actively promoted during the 2008-9 “preferred options” stage of pre-publication consultation. They were all assessed in the same manner, by comparing the likely impact of development against the current impact of the undeveloped site. Thus, each site was assessed against a similar benchmark, allowing comparable results.

- 3.4 The methodology requires that the forecast impact of a site is assessed using 47 sustainability impact indicators, each given one of five scores ranging from “much worse” through “no better or worse” to “much better”. A colour coding system is used to give a clear visual indication of the expected impact. The impact of the proposal against each indicator was forecast for the short (5 years), medium (10 years) and long (15 years) terms. In most cases, the allocations tend to show increasing impact over time. This also provides the assessment of whether impacts are temporary or permanent, as required by the SEA Directive. In the case of potential sites, the timing of development has been assessed using the outcomes of the SHLAA 2009 report, or the phasing policies/assumptions in the Development Plan Document where they are relevant. The assessment further considered potential mitigation/improvement measures for each site, in order to ensure that the least harmful/most positive potential impact was considered. These individual appraisals supported choices about which sites should be included in the Development Plan Document. They are included in Appendix 1.
- 3.5 Having taken these assessments into account in determining the appropriate sites for allocation, policies were prepared for inclusion in the published Development Plan Document. These policies are appraised in Section 7 of this report using the same methodology.
- 3.6 For non site-specific policies, the appropriate alternative is considered to be that the policy is not included. This was the approach taken in assessing policies in the Core Strategy.
- 3.7 The assessment of the impact of each policy and proposal has been undertaken assuming that no other policy areas affect its impact. For instance, when assessing the impact of a site, no account is taken of the potential impact of an adjoining site. This is to ensure that the individual site or policy options can be considered against each other on an equal and clear basis. The individual appraisals of all allocated sites and published policies is included in Section 7 below, based on the detailed appraisals in Appendix 1.
- 3.8 However, these individual appraisals do not necessarily provide a full treatment of the impact of the Development Plan Document taken as a whole. This is because the “do nothing” scenario does not necessarily equate to sites remaining undeveloped. The scenario is set out in Section 4, and it is against this that the Development Plan Document proposals and policies have been assessed as a whole.
- 3.9 Further, the appraisal is required to take account of the interrelationships between policy areas (referred to in the SEA Directive as the “secondary, cumulative and synergistic effects”). The final table of the appraisal sets out the likely implications of the Development Plan Document as a whole, compared with the “no plan” scenario, taking account of these interactions.

3.10 This appraisal examines the impact on a variety of issues closely associated with human health, including access to health infrastructure, but also direct and indirect impacts such as road safety, provision of housing and employment and encouragement of active lifestyles. Accordingly, it has taken account of the relevant national and regional guidance on health impact assessments.

3.11 In order to ensure that statutory consultees had the opportunity to comment on the likely contents of the SA/SEA, and in accordance with the regulations, a scoping report was produced and sent to the three statutory consultees; Natural England, Environment Agency and English Heritage. English Heritage were the only consultee to respond. The key points raised by English Heritage are summarised below, and how they were taken into account in this SA/SEA set out in brackets.

- Promotes a wide definition of the historic environment, also encompassing locally valued and as yet unrecorded assets. (Agreed, and such assets have been considered in the appraisals where relevant and known).
- Advises close involvement of conservation and archaeological staff are closely involved. (Agreed, in-house Conservation staff and the County's archaeological staff have been closely consulted in the preparation of the Development Plan Document and of the appraisals of sites).
- Should take full account of the emerging Regional Spatial Strategy. (Agreed).
- Suggest consideration of a number of other documents for consideration including various Acts and English Heritage documents. (The documents are noted).
- A wide definition of the historic environment is needed for the collection of baseline data, including designated and non-designated features, combining to form a sense of place and local identity. (Agreed to a point, and the consideration of allocations has taken account of potential local impact. However, the priority is the protection and enhancement of the more valuable assets).
- There should be a fuller analysis of the entire historic environment in order to provide a strategy for managing it. (Not agreed, the purpose of the document is to allocate sites for development and provide supporting infrastructure, and the level of analysis and information used in its preparation and in this analysis is sufficient for the purposes of assessing it.)
- Heritage should be considered under social and economic objectives as well. (This is covered through the assessment of synergistic, indirect and secondary effects, for example, the potential economic benefits to a town centre from a heritage-led enhancement scheme are included).
- There should be a consideration of opportunities as well as issues. (Agreed, the Development Plan Document seeks to promote heritage and environmental improvements where possible, and these are reflected in this appraisal).
- There should be additional objectives. (Not agreed, the objectives provide a good range for appropriate environmental assessment, and allow for synergistic and secondary effects to be considered).

- A number of additional indicators relating to the state of the historic environment are suggested. (The indicators used in the SA are considered to provide an appropriate level of detail for the purposes of the Development Plan Document concerned, without over-elaborating and making the SA too expensive or time consuming to undertake).

4.0 Sustainability context

Review of relevant plans and programmes

- 4.1 In order to establish a scope for the SA it was necessary (and a requirement of the SEA) to review and develop an understanding of the key policies, plans and strategies that are relevant to the Allocations and Infrastructure Development Plan Document. These can include international, national, regional and local ones.
- 4.2 The most relevant international, national, regional and local policies for this Development Plan Document are set out in the list below. Note that, in general, the international policies have been incorporated into the relevant national policies, in particular the government's planning policy guidance and planning policy statements.
- 4.3 International Policies
- Johannesburg and Kyoto declarations on Sustainable Development.
 - European Air Quality Directive
 - EC Directive on the Conservation of Natural Habitats
- 4.4 National Policies
- UK Government Sustainable Development Strategy
 - PPGs and PPSs setting out national planning policies
- 4.5 Regional Policies
- Emerging Regional Spatial Strategy
- 4.6 Local Policies
- Mid Devon Core Strategy
 - Mid Devon Local Plan First Alteration
 - Mid Devon Corporate Plan
 - Devon Sustainable Community Strategy
 - Mid Devon Sustainable Community Strategy

Sustainability Appraisal framework of objectives

- 4.7 The SA/SEA for the Core Strategy used the following sustainability objectives:

Objective	Indicators and desired direction of change
Environment	
(A) Biodiversity, flora and nature conservation.	Maintain or enhance the number of sites of nature conservation importance and area of Priority Habitat
(B) Landscape	Maintain area of designated landscape, landscape features and conservation areas. Increase public open space.
(C) Cultural Heritage	Maintain number of and enhance features/sites of archaeological and historical importance. Reduce number of listed buildings on Buildings at Risk Register. Preserve and enhance character of conservation areas.
Natural Resources	
(D) Water	Reduce total length of river being graded bad or poor and increase length of river graded as fairly good or good.
(E) Land and Soils	Increase the proportion of development on brownfield land within settlement boundaries. Reduce the number of contaminated land sites. Maintain the quantity of good to high quality agricultural land.
(F) Air Quality	Reduce the incidence of airborne pollution, particularly close to dwellings.
(G) Traffic and Transport	Increase the number of household that have access to public transport Increase the number of people that use public transport, walk or cycle to work
(H) Waste	Increase the percentage of household waste recycled.
(I) Climatic Factors	Reduce Carbon Dioxide emission. Reduce the number of developments located on land that is liable to flood or in areas that could lead to flooding elsewhere within a catchment.
Social Issues	
(J) Healthy and Safe Living Environments	Increase the proportion of households with access to public open space and reduce levels of Living Environment Deprivation.
(K) Health care, community services and facilities.	Maintain or increase the proportion of households with access to public transport, community facilities and services and reduce the level of barrier to Housing and Services Deprivation Domain.
(L) Housing	Reduce the level of deprivation caused by barriers to Housing and Services. Increase the number of affordable housing units. Ensure that the total number of houses available within Mid Devon meets local housing demand.
(M) Consultation and Social Deprivation	Reduce Multiple Deprivation. Sustain appropriate community consultation and involvement in the preparation of plans

Economic Issues	
(N) Economic Growth	Reduce Income Deprivation. Maintain or increase number of VAT based enterprises. Maintain/increase economic stability by maintaining the diversity of the turnover size of VAT based enterprises.
(O) Rural and Urban Diversification.	Maintain or increase number of VAT based enterprises. Maintain the number of small businesses and increase the diversity of enterprise sizes. Increase the number of economic developments in rural areas.
(P) Employment	Reduce Employment Deprivation. Increase the number of jobs and the diversity of enterprise sizes. Increase the number of employment areas that have access to public transport and are located within settlement boundaries.
(Q) Retail	Maintain and increase the number of retail developments within town centres and local centres. Increase the number of new housing developments and economic developments located within town and local centres.
(R) Tourism	Maintain and increase the number of tourists visiting and spending nights in Mid Devon.

- 4.8 In order to take account of the more specific nature of this document, the approach to assessment has been expanded by additional impact indicators that were used against each objective. The following table sets out the revised sustainability framework used, together with an indication of what is considered to be a positive and negative impact on each one. They are based on the initial details contained in the published scoping report, but have been amended slightly to take account of lessons learnt during the site appraisal process.

Objective	Impact Indicator	Positive Impact	Negative Impact
(A) Wildlife	Priority habitat area, CWS or SSSI	Increase quality or area of site.	Reduce quality or area of site.
	Protected or priority species.	Increase numbers of range.	Reduce numbers or range.
	Wildlife networks	Improve network connections.	Fragment network.
(B) Landscape	Landscape quality and character.	Enhance landscape.	Harm landscape.
(C) Cultural Heritage	Archaeology.	Enhance setting.	Harm site or setting.
	Listed Buildings.	Repair building or improve setting.	Harm character or setting.
	Historic Parks and Gardens	Enhance character or setting.	Harm character or setting.
	Character of conservation areas.	Enhance character.	Harm character.
	Conservation Area Appraisals and Management Plans.	Support implementation.	Hinder implementation.
(D) Water	River quality.	Reduce river pollution.	Increase river pollution.
(E) Land and Soils	Area of contaminated land.	Reduce contamination.	Increase contamination or exposure to contamination.
	Proportion of site which is previously developed.	Over 30%	Under 30%
	Employment - square metres floorspace per hectare.	Over 3500	Under 3500
	Dwellings per hectare.	Over 50	Under 30
(F) Air Quality	Air quality.	Improvement	Worsening within Air Quality Management Area or leading to need for AQMA.
(G) Traffic and Transport	Access to public transport.	7 services Monday – Saturday within 400m	No daily service within 400m
	Proportion to use public transport, walk or cycle to work	Over 20%	Less than 15%
	Road vehicle access.	Improve road safety	Harm road safety
	Impact on public rights of way.	Improve access or quality.	Reduce access or quality.
(H) Waste	No indicators used.		
(I) Climatic Factors	Reduce Carbon Dioxide emission.	Under 0.8 tonnes per dwelling.	Over 1.2 tonnes per dwelling.

	Land on floodplain.	Flood Zone 1 and reduces flooding elsewhere.	Flood Zone 3 or increases flooding elsewhere.
	Renewable energy capacity.	Over 10% energy use.	Under 10% energy use.
(J) Healthy and Safe Living Environments	Public open space.	Provides in excess of 60 square metres per dwelling.	Provides less than 60 square metres per dwelling.
	Road vehicle access.	Improve road safety	Harm road safety
	Number of affordable houses lost and proposed.	Provision in excess of normal policy requirement.	Provision below normal policy requirement.
	Number of jobs lost and created.	Net increase in employment.	Net reduction in employment.
	Avoidance of noise and pollution	Improve air quality and noise conditions.	Reduce air quality and noise conditions.
	Walking and cycling provision	Excellent existing provision or will improve.	Poor existing provision or will get worse.
(K) Health care and community facilities.	Access to public transport.	7 services Monday – Saturday within 400m	No daily service within 400m
	Access to health and other services	Less than 30 minutes public transport time from a hospital.	More than 30 minutes public transport time from a hospital.
	Access to Community Facilities and services.	Shop, school, pub or hall present within the settlement and improvements arising.	Shop, school, pub or hall absent from the settlement.
(L) Housing	Number of affordable houses lost and proposed.	Provision in excess of normal policy requirement.	Provision below normal policy requirement.
	Number of houses lost and proposed.	Net increase in dwellings.	Net reduction in dwellings.
(M) Consultation and Social Deprivation	Community involvement.	Overall public support expressed.	Overall public opposition expressed.
	Access to education and training.	Improvements to education provision.	Reduction in education provision.
	Employment floorspace.	Net increase in employment floorspace.	Net reduction in employment floorspace.
	Number of affordable houses lost and proposed.	Provision in excess of normal policy requirement.	Provision below normal policy requirement.
(N) Economic Growth	Employment, retail and other business floorspace.	Net increase in floorspace.	Net reduction in floorspace.

(O) Rural Diversification.	Employment floorspace in rural areas.	Net increase in rural employment floorspace.	Net reduction in rural employment floorspace.
(P) Employment	Number of jobs lost and created.	Net increase in employment.	Net reduction in employment.
	Key workers housing	Net increase in provision.	Net reduction in provision.
(Q) Retail	Proximity of new housing to retail.	Within a town with a definite town centre.	Not within a settlement containing a shop and not within 30 minutes public transport time of a town centre.
	Location of new retail floorspace.	Within a defined town centre.	Does not accord with the retail sequential test.
	Retail floorspace within villages.	Increases village retail provision.	Reduces rural retail provision.
	Impact on Vitality and Viability of town centres.	Improves.	Harms.
(R) Tourism	Number of tourists spending nights in Mid Devon.	Increases.	Reduces.
	Tourist bedspaces provided.	Increases.	Reduces.

4.9 These objectives give full coverage of the required SEA list of impacts, set out in Annex 1 of the European Directive, as follows:

- Biodiversity (Objective A)
- Population (Objectives J, K, L, M, N, O, P, Q, R)
- Human Health (Objectives J, K, M)
- Fauna (Objective A)
- Flora (Objective A)
- Soil (Objective E)
- Water (Objective D)
- Air (Objective F)
- Climatic Factors (Objective I)
- Material Assets (Objectives G, H, K, L)
- Cultural Heritage including Architectural and Archaeological Heritage (Objective C)
- Landscape (Objective B)

Description of the area's baseline characteristics and future changes

4.10 Collection of the baseline information provides a background to, and evidence base for, identifying both sustainability problems in Mid Devon and

alternative ways of dealing with them, developing the SA framework, and providing the basis for predicting and monitoring the effects of plans. In order to assess how the policies of the Allocations and Infrastructure Development Plan Document can contribute to sustainable development it is essential to understand the economic, environmental and social circumstances in Mid Devon today and their likely evolution in the future. This is also required under the SEA legislation. The aim is to collect only relevant and sufficient data on the present and likely future state of Mid Devon to allow the potential effects of the plan to be adequately predicted.

- 4.11 Information was originally gathered by TEP as part of their preparation of the baseline report. Additional evidence gathered as part of the preparation of the Core Strategy and preparation work on this Development Plan Document and sub-regional work on the Regional Spatial Strategy has also been considered.
- 4.12 The SEA Directive requires identification of the relevant aspects of the current state of the environment and likely future evolution thereof without implementation of the plan or programme. Prediction of future trends is uncertain, but an assessment of the current social, economic and environmental state of the Mid Devon is set out below, starting with baseline data.

Baseline Data Mid Devon District Council	
Land Area	913 square km
Population	75,900 (mid 2007)
Population density	0.84 per hectare
Areas of ecological importance and valuable habitat achieving or retaining statutory or non – statutory designations.	304 hectares SSSI
Proportion of SSSI in favourable condition.	58%
Area of landscape designated for its landscape quality.	5,987 hectares AONB
Total number of Tree Preservation Orders.	261
Areas of Ancient and other woodland.	2,703 hectares AW
Number of Historic Parks and Gardens.	3 Registered 13 Devon Local List
Number of Listed Buildings	2,559
Number of Scheduled Monuments	49
Number of Conservation Areas	50
Length of rivers of good or fair quality.	1995 – 92% 2000 – 86% 2005 – 96%

Proportion of dwellings built on previously developed land.	2000/1 21% 2001/2 11% 2002/3 32% 2003/4 11% 2004/5 36% 2005/6 46% 2006/7 45% 2007/8 49%
Number of Air Quality Management Areas.	2 (Crediton and Cullompton)
Travel to work by Mode.	Work at home 17% Public Transport 3% Driving 60% Car Passenger 6% Bicycle 2% Walking 12% Other 1% Average distance 13.0 km
Percentage of household waste recycled.	2002-3 13% 2003-4 15% 2004-5 16% 2005-6 28% 2006-7 44% 2007-8 48%
Indices of deprivation 2007 – numbers and proportions of Super Output Areas within most deprived 20% in England. Note there are 43 Super Output Areas in Mid Devon.	Multiple 1 (2%) Income 1 (2%) Employment 0 (0%) Health 0 (0%) Education 6 (14%) Crime 0 (0%) Barrier to Housing and Services 26 (60%) Living Environment 15 (35%)
Affordable Housing completions.	2001/2 17 2002/3 27 2003/4 26 2004/5 42

	2005/6 59 2006/7 49 2007/8 110 2008/9 115												
Average House Price	2008: £212,946												
Number of VAT registered businesses.	1994 3,415 1995 3,405 1996 3,435 1997 3,480 1998 3,505 1999 3,530 2000 3,530 2001 3,565 2002 3,560 2003 3,615 2004 3,660 2005 3,710 2006 3,950												
Job Seekers Allowance claimants as a proportion of working age population.	2000 1.9% 2001 1.6% 2002 1.5% 2003 1.3% 2004 1.0% 2005 1.1% 2006 1.5% 2007 1.0% 2008 1.4%												
Number of jobs.	32,000 (0.77 jobs per working age person).												
Retail indicators.	Average hourly pedestrian flows: <table border="1"> <thead> <tr> <th></th> <th>2006</th> <th>2008</th> </tr> </thead> <tbody> <tr> <td>Tiverton</td> <td>915</td> <td>766</td> </tr> <tr> <td>Cullompton</td> <td>341</td> <td>317</td> </tr> <tr> <td>Crediton</td> <td>401</td> <td>396</td> </tr> </tbody> </table>		2006	2008	Tiverton	915	766	Cullompton	341	317	Crediton	401	396
	2006	2008											
Tiverton	915	766											
Cullompton	341	317											
Crediton	401	396											
Tourism visitor numbers (1000's)	2001 414 2002 499 2003 553												

	2004 542 2005 544 2006 542 2007 592
Tourist accommodation bedspaces	2001 3,970 2002 3,960 2003 3,790 2004 3,650 2005 3,670 2006 3,730 2007 3,760

Location

- 4.13 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

- 4.14 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. There are many small historic settlements containing thatched cottages and ancient churches. This hilly, agricultural landscape is the area's defining physical and environmental characteristic. The mild, damp climate is typical of an inland area within the south west. Annual average temperatures and rainfall are high compared with the rest of England. Winter rainfall is also relatively high. The more elevated upland areas of Dartmoor, Exmoor and the Blackdown Hills are areas of higher rainfall still (particularly during winter), and the rivers which flow through the district rise in these areas. Accordingly, flooding can be a significant problem for riverside settlements.
- 4.15 Most of the district drains southwards. The rivers Culm, Lowman, Exe, Creedy and Yeo, each set in a steep sided river valley for much of their course, converge at Cowley Bridge, just to the south of the District boundary and on the outskirts of Exeter, flowing on as the River Exe to the English Channel at Exmouth. 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. Much of Tiverton, for instance, is within the natural floodplain of the rivers Exe and Lowman, where high water events are held back by artificial flood defence systems.

Biodiversity

- 4.16 Devon's great variation in geology and landform enables numerous species which are at the edge of their geographical ranges to coexist in Devon. Of 34 species only found in the UK 16 are found in Devon. Three of these are believed to be found nowhere else. Currently, there are 13 Sites of Special Scientific Interest (SSSI) and more than 200 county wildlife sites scattered throughout the district. Mid Devon district also supports 12 different priority habitats including grassland, heathland, woodland and marsh.
- 4.17 Studies carried out at a national level have shown that substantial changes to wildlife have occurred throughout this century, with some of the most rapid changes taking place in the post-war era. Trends in Devon are similar to those for the country as a whole. More recent studies have shown that loss and damage to habitats has continued over the last two decades. Any changes in the extent and quality of wildlife habitats are likely to have a corresponding effect upon the populations of individual species that they support. The same general trend of decline is evident for many of the species for which records are held over the last few decades.
- 4.18 The main threats to biodiversity include environmental pollution, land use change, fragmentation and invasive species introduction. Biodiversity may also be affected by climate change.

Heritage

- 4.19 This environmental richness is enhanced by the historic and built environment, with 2559 listed buildings, 50 Conservation Areas and 49 Scheduled Monuments within its area.

Population and housing

- 4.20 The latest 2007 estimate puts the Mid Devon population at 75,900 which gives an average population density of less than one person per hectare. This places it as one of the most sparsely populated authorities within England and Wales. The main concentration of people is found in the eastern part of the District where the towns of Tiverton (pop 21,600) and Cullompton (pop 8,300) lie within 6km of each other and similarly close to Junctions 27 and 28 of the M5 and the mainline railway station at Tiverton Parkway. Crediton (pop 7,300) is the largest settlement in the west of the District. However, the majority of residents live outside these three towns, in smaller settlements.
- 4.21 Mid Devon's population has grown considerably in recent years, with the total rising from 58,600 in 1981 to 75,900 in 2007, increasing on average by 665 per year. Almost all of this growth has arisen because more people are moving into the District than are moving out (net in-migration). To accommodate this additional population, as well as the gradual long term reduction in the number of people living in each dwelling, there were 8286 dwellings completed from 1981 – 2004 (averaging 360 per year). There is an expectation of continued demand for new housing in Mid Devon in the longer term.
- 4.22 Before the current recession in the housing market, house prices were above the national average. However, in common with many rural districts, the provision of social rented accommodation is limited – 14.1% of households are in dwellings rented from Mid Devon District Council or a Housing Association, compared with 19.2% in England as a whole. Studies on behalf of the Council have shown that there is a considerable shortage of

affordable housing. South West house prices had risen substantially in the last 20 years. Mid Devon's houses are even more expensive. 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 housebuyers in the UK. It is likely that a mismatch between the overall supply and demand for housing is the root cause of this, although shorter term issues such as low interest rates have contributed to recent house price rises. If these trends were to continue, then increasing numbers of local residents trying to enter the housing market for the first time, would be unable to afford to purchase or rent houses in the area. These house price rises, which have been felt throughout the UK, led the Government to prepare a report on the housing market in Britain. One of the recommendations of this report, known as the "Barker Review", was that there needed to be a large increase in housing completions in order to stabilise house prices in the longer term. This national background has led to proposals for increased housing provision in the South West being contained within the emerging Regional Spatial Strategy, reflected in a small increase in the Mid Devon strategic housing figures.

Economy

- 4.23 The nearby Principal Urban Area of Exeter exerts an influence over the Mid Devon economy. 16% of Mid Devon's working population found employment in Exeter according to the 2001 Census. Rural wards in the south, which lie closest to Exeter, are particularly strongly affected, and the towns of Crediton and Cullompton are also prone to this economic "pull", with figures of 26% and 19% respectively. In contrast, Tiverton is less affected with just 8% 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 62%; Crediton 52% to 49% and Cullompton 47% to 43%).
- 4.24 A similar pattern of activity and movement can be discerned for retail activity. Data from the Retail Report carried out for Mid Devon District Council shows that Tiverton has a wide catchment area, with regular customers from throughout the eastern part of the District. Crediton has a smaller catchment while Cullompton meets fairly local needs only. Again, Exeter provides a shopping destination for many Mid Devon residents, with Taunton also providing a retail pull on the eastern part of the District.
- 4.25 Working at home is increasing in the District. In 1981 and also in 1991 12% worked at home but this significantly increased to 17% by 2001. It is possible 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%.
- 4.26 Manufacturing is particularly important in Mid Devon accounting for 22% of jobs compared to 10% in the wider Exeter area (ie Exeter, East Devon, Mid Devon and Teignbridge). 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.

- 4.27 The proportion of retail employment in the Exeter area broadly compares to the South West. The exception is Mid Devon where employment in this sector fell from 91% of the regional average to 78% in the 10 years to 2001. Superstore proposals, including recently built stores at Tiverton and Cullompton and one under construction at Crediton, should arrest or reverse this decline and reduce outflow of expenditure to principal urban areas. Limited additional need is forecast.
- 4.28 Small and very small businesses are important to the local economy. In the Exeter area 83% of businesses employ less than 10 people, a figure which rose significantly during the 1990's. Rural districts show higher proportions still. Self-employment accounts for 13% of the Exeter area's employment, with, again, significantly higher rates in the rural areas particularly Mid Devon.
- 4.29 Key stakeholders stress the importance of an adequate supply of employment sites in addressing local economic need. There appears to be significant unmet demand for small and medium size premises in the market towns. However, the provision of affordable and managed workspace is often unviable without public sector intervention.

Resources

- 4.30 As a largely undeveloped area, there is clearly sufficient land within Mid Devon to accommodate any level of development that could be foreseen. However, the Government's policy is to minimise the development of Greenfield land, and to promote "brownfield" (previously developed land) for redevelopment. Historically, some 25% of Mid Devon's housing development has been on previously developed land, although the Mid Devon Local Plan First Alteration sought to increase this, and more recently the proportion has increased. The Core Strategy sets a long term target of 30%.
- 4.31 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. As a non-renewable resource, by definition, it cannot be created anew to replace its use. Accordingly, at some stage there will no longer be oil to use. Exactly when this will occur is subject to debate and disagreement. The world uses about 75 million barrels per day. 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.
- 4.32 In 2003 the EU published a paper entitled "European Energy and Transport – Trends to 2030" which estimated current worldwide reserves of oil amounting to 165 billion tonnes of oil, which at current rates of consumption is sufficient for approximately 45 years. However, oil production is likely to follow a downward curve, with production slowing as more difficult sources are tapped later, and insufficient discoveries are made to cover the reductions. 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 (ie before 2021). 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.

- 4.33 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 may be increased energy efficiency.
- 4.34 Public finance will almost certainly 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 or Community Infrastructure Levy. Forecasting the availability of public finance is subject to uncertainties arising from economic performance and political changes.
- 4.35 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. The current market conditions, engendered by the international “credit crunch” are of low levels of private investment. Forecasts of future performance vary, but it is expected that the economy will resume growth within the early part of the plan period.

Transport

- 4.36 Car use and ownership in the UK has increased considerably in the past 30 years. The percentage of households with access to a car and the average mileage travelled are both rising. The length of UK motorways has almost doubled since 1975/76. In Devon there has been a 6% increase in households who own more than one car from 1991 to 2001. There has been a corresponding shift to car use from other modes of transport in the UK. The average distance travelled in local buses has decreased by 40% since 1975/76. The number of walking trips also fell by 20% in the last 10 years. The proportion of children walking to school is declining while more children are driven to school by car.
- 4.37 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 1986-1999. This is a very high growth rate compared with the 31% growth in England and Wales, and 19% growth in Exeter and Barnstaple. Despite the increase in traffic, the accident record has shown considerable improvement, with a 7% reduction in injurious accidents between 1990-2001. Within Mid Devon, the reduction has been a more dramatic 23%.
- 4.38 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.
- 4.39 Crediton and Cullompton are declared an Air Quality Management Areas as a result of excess levels of Nitrogen Dioxide and (in the case of Crediton) Particulates. Traffic volumes, congestion and the ‘canyon’-like effects of buildings causing poor dispersion are the main causes. In the case of Crediton, the particulates are emitted from HGVs.

Safety and health

- 4.40 Mid Devon is an area of low crime incidence – data for 2000 – 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.
- 4.41 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. Similarly, the proportion who considered they had a limiting long term illness was lower than for England and Wales as a whole. 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.
- 4.42 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.

Business as usual (“no plan”) forecast

- 4.43 The SA/SEA must include an explanation of the likely evolution of the environment without implementation of the plan. This can be termed the No Plan or Business as usual forecast. The Core Strategy SA/SEA report set out such a forecast based on the continuation of past trends. However, the adoption of the Core Strategy in 2007 means that this is no longer an appropriate forecast. The Core Strategy is now part of the Development Plan, and planning decisions on applications must take it into account. Accordingly, the influence of the Core Strategy will be felt in the Business as Usual evolution. However, as the Core Strategy does not contain any site-specific proposals, its ability to influence the spatial development of Mid Devon is limited to the influence of its policies. Similarly, the Regional Spatial Strategy is an emerging document, close to its final stage, and the policies and strategy it contains will be influential. Finally, the adopted Local Plan contains a number of policies and proposals which will continue to be relevant, in particular remaining allocations for development.
- 4.44 Accordingly, the business as usual forecast assumes that the Adopted Mid Devon Local Plan, the Regional Spatial Strategy and the Mid Devon Core Strategy will apply, but no Allocations and Infrastructure Development Plan Documents is prepared.
- 4.45 It can be expected that the existing Local Plan allocations and other commitments are developed over the next 5 – 10 years, but no additional allocations are made. Additional development will come forward on “windfall” (unallocated) sites only. The Local Plan and Core Strategy policies are implemented as far as possible, but without the ability to allocate land or make proposals for specific uses. Looking at the likely outcomes in more detail, the following sectoral analysis is suggested.

Housing

- 4.46 Regional Spatial Strategy housing numbers are provided in the short term (possibly up to 5 years, depending on market conditions), on remaining local

plan allocations, existing commitments, new permissions on previously developed land within settlements and a small number of rural exceptions sites for affordable housing. However, towards the end of this period, there will be less than a 5 year land supply, as required by national advice in Planning Policy Statement 3. In accordance with that guidance, it is very likely that applications for unallocated sites adjoining the settlements will be made, and granted either initially or on appeal. Such sites are likely to be the easier ones to develop, where access and other infrastructure is available, such as small to medium sized peripheral Greenfield sites. The supply of housing may slow a little, reflecting potential difficulties gaining planning permission on such sites, although this is not certain.

Employment

- 4.47 Core Strategy employment numbers are not met, with only existing allocations and small scale rural developments coming forward. There will be pressure to develop large scale employment sites at major road junctions or other easy to access locations. The consequence will be that the aimed-for employment growth in Mid Devon would be highly constrained, and therefore there will continue to be significant outflow of commuters to nearby urban areas such as Exeter and Taunton, with negative impact on climate change. The Mid Devon economy is likely to see significant sectoral shifts, with reductions in manufacturing and agricultural employment and a growth in service industries. But with population growth continuing to outstrip employment provision, and the growth in the nearby economies of Exeter and Taunton, the trend towards increased out-commuting is expected to continue.

Retail

- 4.48 Town centre retail provision is confined to small units, with major development limited to existing commitments. Further out of centre/out of town sites do not appear to be likely in the foreseeable future, given recent developments and commitments. This issue may arise again towards the end of the period.

Infrastructure

- 4.49 No major infrastructure provision is made, but continued contributions to small scale infrastructure will come forward from development and public finances. The application of existing policies should continue to provide affordable housing, public open space, education and other iterative infrastructure provision. However, strategic infrastructure provision would not be likely to come forward without a plan-led process. Infrastructure such as including relief roads, public transport enhancements, new schools, strategic green infrastructure and community space are likely to remain unprovided in this scenario. One exception to this may be the provision of a link road in Crediton, for which there is an existing funding mechanism, and County Council support in their capital programme. Cullompton, on the other hand, would continue to suffer town centre air quality problems and environmental degradation.

Locations

- 4.50 The impact of these changes will not be uniform across the district, and where a town or location is likely to have a different outcome these are set out below.

Tiverton

- 4.51 Provision of additional employment in Tiverton will continue to be extremely limited, reflecting the access difficulties associated with potential employment sites. It is also likely that housing provision will be lower than the Core Strategy figures suggest, with increasing difficulty in bringing forward significant housing sites for the same reason. Housing sites which come forward through the planning application/appeal system are likely to be ones with unfortunate transport, landscape or other implications. Contributions to education would be in the form of small payments, and the County Council will be unlikely to provide an additional secondary or primary school as a result. Provision will be in the form of growth in existing schools in a fairly ad-hoc manner.

Cullompton

- 4.52 The provision of housing and employment in Cullompton may be limited by the need to enhance the motorway junction to avoid Highways Agency objections, depending on the cost of junction improvements. It is also likely that air quality exceedences in the town centre will act to restrict new development, given the need for major relief road provision to overcome this environmental constraint. Alternatively, the housing will come forward on appeal, but air quality will deteriorate. Pressure on education services would be met through expansion of existing schools rather than a new primary school.

Crediton

- 4.53 The Crediton Link Road is now contained in the County Council's capital programme, and therefore should be completed without the need for the DPD. This is likely to open up land for additional housing development in the east of the town, but employment provision is likely to be limited to the existing consent.

Bampton

- 4.54 Small scale peripheral housing sites would probably be developed in the order in which they became available, but no additional employment land beyond that already committed would be likely.

Villages

- 4.55 A number of rural exception sites would probably come forward.

Sustainability objectives

- 4.56 The impact of these changes on the sustainability objectives is set out below:
- (A) Gradual reduction in biodiversity in the wider countryside, arising from lack of management and climate change. Gradual loss of biodiversity on edges of towns through peripheral development, although limited by site specific mitigation and impact of existing planning policies.
 - (B) Limited change in appearance of the countryside. Some small scale changes adjoining villages arising from exceptions sites. Significant change on the medium term adjoining the towns, arising from peripheral Greenfield sites coming forward in an ad-hoc manner.
 - (C) Quality of Listed Buildings and Scheduled Monuments will remain protected, but Conservation Areas and undesignated areas will gradually lose some aspects of character through small scale changes.

- (D) Limited change in water quality.
- (E) Continued development of brownfield land within settlements, but possibly reducing proportions in the medium to long term as peripheral Greenfield developments come forward to meet strategic targets.
- (F) Continued worsening of air quality in urban areas arising from continued traffic growth and lack of major infrastructure.
- (G) Little improvement to public transport services, particularly in rural areas, and a continued rise in car use for all journey types and distances. Longer distances travelled, with more commuting out of the District.
- (H) Gradual increase in recycling rates, depending largely on public sector investment in collection methods.
- (I) Continued increase in carbon dioxide emissions from activities in Mid Devon, contributing to a continued warming of the global climate. Local climatic changes become obvious, and indeed are likely to speed up. Increased flooding risk along the main rivers, including parts of Cullompton and Tiverton. Limited development in functional floodplains.
- (J) New small scale public open space provided in a number of developments, and continued investment in improvement of existing public open space. Limited additional sports pitches or other large scale public open space/green infrastructure.
- (K) No increase or possibly reduction in public transport provision, particularly in rural areas. Continued decline in other rural services.
- (L) Housing concentrated at the towns, with continued provision of affordable housing in accordance with current policies. Small scale rural exceptions sites come forward in some villages. Due to the difficulties gaining planning permission in unallocated Greenfield sites, a reduced provision of housing in the medium to long term.
- (M) Multiple deprivation is likely to remain concentrated in a few small pockets, and limited local employment growth, possibly loss of businesses through site redevelopment for housing. Demands for public consultation continue to increase, with opposition to new development growing, particularly to unallocated Greenfield sites adjoining towns.
- (N) Continued growth in small businesses particularly working from home, subject to recovery in the economy. Limited economic development land being developed, particularly in Tiverton.
- (O) Rural areas likely to continue current pace of economic growth. Lack of available land limits development in the towns, particularly Tiverton. Main growth areas will be outside the district, particular Exeter and Taunton.
- (P) Economic restructuring will reduce the availability of manufacturing, agricultural and associated employment, and there will be limited growth within other sectors. However, with the availability of jobs in nearby urban areas, unemployment will remain low.
- (Q) It is likely that there will be limited additional retail investment in the town centres, but large scale retail seems unlikely beyond existing commitments.
- (R) Tourist spend will continue to grow gradually.

5.0 Key sustainability issues

- 5.1 Arising from this analysis, a number of key sustainability problems and issues can be picked out, which are priorities for the Allocations and Infrastructure Development Plan Document to address. These have been chosen based on the review of previous local planning policies and in particular the 2004 Local Plan Inspector's Report, the Adopted Core Strategy, the emerging regional spatial strategy, the council's corporate objectives and the community plan, as well as an analysis of the sustainability trends considered above. Comments on the Allocations and Infrastructure Development Plan Document received during the pre-publication consultations were also assessed to see if new key issues emerged.
- 5.2 The key strategic problems, objectives and issues for sustainability identified for Mid Devon are set out below. They continue to reflect those which informed the preparation of the Core Strategy.
- 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. The need for additional employment particularly in Tiverton.
 - 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.
 - 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.

6.0 Allocations and Infrastructure Development Plan Document Options

- 6.1 The strategic background is already adopted, and therefore the key district-wide strategic decisions have already been taken. However, the achievement of this strategy still gives scope for alternative allocations and alternative approaches to the provision of infrastructure. The consultation process, which started with Issues and Options Reports, examined potential options, both in terms of specific sites and also, in the case of the three largest market towns, how those sites might fit together into strategies for that town.

Appraisal of initial Draft Allocations and Infrastructure Development Plan Document

- 6.2 The Issues and Options Reports set out alternative sites and strategies, which have been assessed, as set out above. The report contained a summary of the key sustainability issues for each site, based on initial appraisal work. A separate appraisal was not published at that time. Arising from this, a Preferred Option was prepared, seeking to allocate the most appropriate sites and indicate the key infrastructure priorities for the area.

6.3 The sites and proposals contained within the Preferred Option have been subject to individual appraisal, and the results of these appraisals are set out in Appendix 1, together with appraisals of the other sites promoted to us. As a result of these appraisals, decisions have been taken of which sites are to be allocated and which excluded, and what mitigation measures were considered for incorporation into the policies of the Development Plan Document.

Policy and/or site improvements made

6.4 For all these sites, a variety of potential mitigation measures were considered during the appraisal process, examples including the provision of green infrastructure and sustainable urban drainage schemes, alterations to the site area and provision of transport infrastructure.

Summary of changes arising

6.5 Each of these recommendations of the SA/SEA has been assessed and have, where sensible, been incorporated into the final version of the Preferred Allocations and Infrastructure Development Plan Document. Where it has not been possible to take these recommendations into account, then the reasons are set out later in the site assessment table.

Published Allocations and Infrastructure Development Plan Document Appraisal

6.6 Emerging from the work set out in the previous section, the final wording of the Published Allocations and Infrastructure Development Plan Document was prepared. The policies, proposals and supporting justification are set out in the separate document, which has been published for public consultation in accordance with the Planning and Compulsory Purchase Act 2004 and associated regulations. This section sets out the detailed assessment of the policies and allocations of that document, setting out impacts in the Short (1-5 years), Medium (6- 10 years) and Long (11+ years) terms. These are indicated as S, M and L on the matrices. Site specific proposals (allocations and infrastructure) are examined first, followed by non site specific policies. The coding used throughout is:

1	(green) much better, very significant improvement compared with no plan
2	(yellow) better, significant improvement compared with no plan
3	(white) no better or worse, no significant change compared with no plan
4	(orange) worse, significant detriment compared with no plan
5	(red) much worse, very significant detriment compared with no plan

Impact of site specific proposals

6.7 The allocations and infrastructure proposals contained in the Development Plan Document are all essentially similar to one of the sites previously considered, and assessed in the appraisals in Appendix 1. Accordingly, the impacts of the sites proposed to be allocated are set out in one overall table, with more details and justification set out in the Appendix. Cross referencing information is included to help with that process. The appraisals are set out in the same order as the Development Plan Document (Tiverton, Cullompton, Crediton, Bampton, Rural). The tables below set out the impact on each objective, taking account of the impact indicators examined for each

proposal. The Development Plan Document reference is given (all prefixed AL/) followed by the reference used in Appendix 1.

Tiverton Sites	Timescale	A Biodiversity	B Landscape	C Heritage	D Water	E Land	F Air Quality	G Transport	I Climate	J Health	K Facilities	L Housing	M Deprivation	N Economy	O Diversification	P Employment	Q Retail	R Tourism
TIV/1 - 7 (Eastern Urban Extension)	S	3	3	3	3	3	3	3	3	3	3	3	4	3	3	3	3	3
	M	2	4	4	3	5	3	2	2	2	2	2	2	2	3	2	2	3
	L	2	4	4	3	5	3	2	2	2	2	2	1	1	3	1	2	3
TIV/8 (Farleigh Meadows)	S	3	3	3	3	4	3	2	2	2	2	2	4	3	3	2	2	3
	M	3	3	3	3	4	3	2	2	2	2	2	3	3	3	2	2	3
	L	3	3	3	3	4	3	2	2	2	2	2	3	3	3	2	2	3
	S																	
	M																	
	L																	
TIV/10 (Howden Court)	S	3	4	3	3	2	3	2	2	2	2	2	3	3	3	3	2	3
	M	3	3	3	3	2	3	2	2	2	2	2	3	3	3	3	2	3
	L	3	3	3	3	2	3	2	2	2	2	2	3	3	3	3	2	3
TIV/11 (Belmont Hospital)	S	3	3	3	3	2	3	2	1	3	2	2	3	3	3	3	2	3
	M	3	3	3	3	2	3	2	1	3	2	2	3	3	3	3	2	3
	L	3	3	3	3	2	3	2	1	3	2	2	3	3	3	3	2	3
TIV/12 (St Andrews Street)	S	3	3	2	3	2	3	2	1	2	1	2	3	3	3	3	2	3
	M	3	3	2	3	2	3	2	1	2	1	2	3	3	3	3	2	3
	L	3	3	2	3	2	3	2	1	2	1	2	3	3	3	3	2	3
TIV/13 (William Street)	S	3	3	2	3	2	3	2	2	2	1	2	2	2	3	2	2	3
	M	3	3	2	3	2	3	2	2	2	1	2	2	2	3	2	2	3
	L	3	3	2	3	2	3	2	2	2	1	2	2	2	3	2	2	3
TIV/14 (Palmerston Park)	S	3	3	3	3	4	3	2	2	1	3	1	3	3	3	3	3	3
	M	3	3	3	3	4	3	2	2	1	3	1	3	3	3	3	3	3
	L	3	3	3	3	4	3	2	2	1	3	1	3	3	3	3	3	3
TIV/15 (Blundells Garage)	S	3	3	2	3	2	3	2	2	3	2	2	3	3	3	3	2	3
	M	3	3	2	3	2	3	2	2	3	2	2	3	3	3	3	2	3
	L	3	3	2	3	2	3	2	2	3	2	2	3	3	3	3	2	3
TIV/16	S	3	3	3	3	2	3	2	2	1	2	1	3	3	3	3	3	

(Roundhill)	M	3	3	3	3	2	3	2	2	1	2	1	3	3	3	3	3	3
	L	3	3	3	2	2	3	2	2	1	2	1	3	3	3	3	3	3
TIV/17 (Hay Park)	S	3	3	3	3	2	3	2	2	3	3	2	3	3	3	3	3	3
	M	3	3	3	3	2	3	2	2	3	3	2	3	3	3	3	3	3
TIV/18 (The Avenue)	L	3	3	3	3	2	3	2	2	3	3	2	3	3	3	3	3	3
	S	3	3	3	3	2	3	2	2	2	2	2	3	3	3	3	3	3
	M	3	3	3	3	2	3	2	2	2	2	2	3	3	3	3	3	3
TIV/19 (Phoenix Lane)	L	3	3	3	3	2	3	2	2	2	2	2	3	3	3	3	3	3
	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	2	3	1	2	2	1	3	3	2	3	2	2	2
TIV/20 (Bampton Street)	L	3	3	2	1	2	3	2	2	2	1	3	3	2	3	2	2	3
	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	1	3	2	3	2	2	2	1	3	3	2	3	2	2	3
TIV/21 (Tidcombe Hall)	L	3	3	3	3	4		3		3	3	2	3	3	3	3	3	3
	S	3	3	3	3	3	3	3	3	3	3	3	4	3	3	3	3	3
	M	3	3	4	3	4	3	3		3	3	2	3	3	3	3	3	3

Cullompton Sites	Timescale	A Biodiversity	B Landscape	C Heritage	D Water	E Land	F Air Quality	G Transport	I Climate	J Health	K Facilities	L Housing	M Deprivation	N Economy	O Diversification	P Employment	Q Retail	R Tourism
CU/1 - 7 (North West Cullompton)	S	3	3	3	3	3	3	3	3	3	3	3	4	3	3	3	3	3
	M	3	4	3	3	5	2	2	3	2	2	2	2	1	3	1	2	3
	L	3	4	3	3	5	2	2	3	1	2	1	1	1	3	1	2	3
CU/8 (Knowle Lane)	S	3	3	3	3	3	3	3	3	3	3	3	4	3	3	3	3	3
	M	3	4	3	3	4	3	2	3	2	2	2	3	3	3	3	3	3
	L	3	4	3	3	4	3	2	3	2	2	2	3	3	3	3	3	3
CU/9 (Court Farm)	S	3	3	2	3	4	3	3	3	2	2	2	3	3	3	3	3	3
	M	3	3	2	3	4	2	2	3	2	2	2	3	3	3	3	2	3
	L	2	3	2	3	4	1	2	3	2	2	2	3	3	3	3	2	3
CU/10 (Padbrook Park)	S	3	3	3	3	2	2	2	3	3	3	2	3	3	3	3	3	3
	M	3	3	3	3	2	2	2	3	3	3	2	3	3	3	3	3	3
	L	3	3	3	3	2	2	2	3	3	3	2	3	3	3	3	3	3

CU/11 (Exeter Road)	S	3	3	3	3	2	2	2	3	3	3	2	3	3	3	3	3	3
	M	3	3	3	3	2	2	2	3	3	3	2	3	3	3	3	3	3
	L	3	3	3	3	2	2	2	3	3	3	2	3	3	3	3	3	3
CU/12 (Lower Bull Ring)	S	3	3	1	3	2	3	2	1	2	1	3	2	2	3	2	2	2
	M	3	3	1	3	2	2	2	1	2	1	3	2	2	3	2	2	2
	L	3	3	1	3	2	1	2	1	2	1	3	2	2	3	2	2	2
CU/13 (Week Farm)	S	3	3	3	3	5	3	3	1	1	3	3	1	1	3	1	3	3
	M	2	3	3	3	5	2	3	1	1	3	3	1	1	3	1	3	3
	L	2	3	3	3	5	2	3	1	1	3	3	1	1	3	1	3	3
CU/14 (Eastern Distributor Road)	S	3	3	3	3	3	3	3	2	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	4	1	1	2	3	3	3	3	3	3	3	2	2
	L	3	3	3	3	4	1	1	2	3	3	3	3	3	3	3	2	2
CU/17 (Town Centre)	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	2	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	L	3	3	2	3	3	3	2	3	3	3	3	3	2	3	2	2	2
CU/18 Walking and Cycling	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	3	2	2	2	2	2	3	3	3	3	3	3	3
	L	3	3	3	3	3	2	2	2	2	2	3	3	3	3	3	3	3
CU/19 Rail Station	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	L	3	3	3	3	3	3	2	2	3	2	3	3	3	3	3	3	3
CU/20 Colebrook	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	4	3	3	4	2	3	2	3	2	2	3	3	3	3	3	3
	L	3	4	3	3	4	2	3	2	3	2	2	3	3	3	3	3	3

Crediton Sites	Timescale	A Biodiversity	B Landscape	C Heritage	D Water	E Land	F Air Quality	G Transport	I Climate	J Health	K Facilities	L Housing	M Deprivation	N Economy	O Diversification	P Employment	Q Retail	R Tourism
CRE/1 (Wellparks)	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	4	4	3	4	3	2	2	2	3	2	2	2	3	2	3	3
	L	2	4	3	3	4	3	2	2	2	3	2	2	2	3	2	3	3
CRE/2 (Red Hill Cross)	S	3	4	3	3	4	3	2	2	2	3	2	2	1	3	1	2	3
	M	3	4	3	3	4	3	2	2	4	2	3	4	3	3	3	3	3
	L	3	4	3	3	4	3	2	2	4	2	3	4	3	3	3	3	3

CRE/3 (Cromwells Meadow)	S	3	3	3	3	3	3	3	3	3	3	3	4	3	3	3	3	3
	M	3	4	4	3	4	2	2	2	3	3	2	3	3	3	3	3	3
	L	3	3	3	3	4	2	2	2	3	3	2	3	3	3	3	3	3
CRE/4 (George Hill)	S	3	3	3	3	3	3	3	3	3	3	2	3	3	3	3	3	3
	M	3	3	3	3	3	3	3	3	3	3	2	3	3	3	3	3	3
	L	3	3	3	3	3	3	3	2	3	3	2	3	3	3	3	3	3
CRE/5 (The Bike Shed)	S	3	3	2	3	2	3	2	3	4	3	2	3	4	3	4	3	3
	M	3	3	2	3	2	3	2	2	4	3	2	3	4	3	4	3	3
	L	3	3	2	3	2	3	2	2	4	3	2	3	4	3	4	3	3
CRE/6 (Woods Group)	S	3	3	3	3	2	4	2	3	3	3	2	4	4	3	4	2	3
	M	3	3	3	3	2	4	2	3	3	3	2	4	4	3	4	2	3
	L	3	3	3	3	2	4	2	3	3	3	2	4	4	3	4	2	3
CRE/7 (Wellparks)	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	4	3	2	2	2	3	3	2	2	3	2	3	3
	L	3	3	3	3	4	3	2	2	2	3	3	2	2	3	2	3	3
CRE/9 (Crediton Link Road)	S	3	4	4	4	3	1	2	3	2	3	3	3	3	3	3	3	3
	M	3	3	4	3	3	1	2	3	2	3	3	3	3	3	3	3	3
	L	2	3	3	3	3	1	2	3	2	3	3	3	3	3	3	3	3
CRE/10 (Crediton Bypass)	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	L	4	4	4	3	4	1	1	3	2	3	3	3	3	3	3	3	3
CRE11 (Queen Elizabeth School)	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	4	2	3	2	3	3	3	1	3	3	3	3	3
	L	3	3	3	3	4	2	3	2	3	3	3	1	3	3	3	3	3
CRE/12 (Cemetery)	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	4	3	3	3	3	3	3	3	3	3	3	3	3
	L	3	3	3	3	4	3	3	3	3	3	3	3	3	3	3	3	3
CRE/13 (Pedlerspool)	S	3	3	3	3	3	3	3	3	3	3	3	4	3	3	3	3	3
	M	3	4	4	3	4	3	2	1	2	3	2	2	1	3	1	2	3
	L	3	3	4	3	4	3	2	1	2	3	2	2	1	3	1	2	3

Bampton Sites	Timescale	A Biodiversity	B Landscape	C Heritage	D Water	E Land	F Air Quality	G Transport	I Climate	J Health	K Facilities	L Housing	M Deprivation	N Economy	O Diversification	P Employment	Q Retail	R Tourism
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BA/1 (School Close)	S	3	3	3	3	3	3	2	4	3	3	2	3	3	3	3	3	3
	M	3	3	3	3	3	3	2	4	3	3	2	3	3	3	3	3	3
	L	3	3	3	3	3	3	2	4	3	3	2	3	3	3	3	3	3
BA/2 (Bourchier Close)	S	3	3	3	3	4	3	3	3	2	3	2	3	2	2	2	3	3
	M	3	3	3	3	4	3	3	3	2	3	2	3	2	2	2	3	3
	L	3	3	3	3	4	3	3	3	2	3	2	3	2	2	2	3	3
BA/3 (Ashleigh Park)	S	3	3	3	3	4	3	3	3	3	3	2	3	3	3	3	3	3
	M	3	3	3	3	4	3	3	3	3	3	2	3	3	3	3	3	3
	L	3	3	3	3	4	3	3	3	3	3	2	3	3	3	3	3	3
BA/4 (Newton Square)	S	3	3	3	3	2	3	3	3	3	3	2	4	3	3	3	3	3
	M	3	3	3	3	2	3	3	3	3	3	2	3	3	3	3	3	3
	L	3	3	3	3	2	3	3	3	3	3	2	3	3	3	3	3	3

Village Sites	Timescale	A Biodiversity	B Landscape	C Heritage	D Water	E Land	F Air Quality	G Transport	I Climate	J Health	K Facilities	L Housing	M Deprivation	N Economy	O Diversification	P Employment	Q Retail	R Tourism
GT/1 (Five Bridges, Merrimeade Farm)	S	3	3	3	3	4	3	3	3	1	3	1	1	3	3	3	3	3
	M	3	3	3	3	4	3	3	3	1	3	1	1	3	3	3	3	3
	L	3	3	3	3	4	3	3	3	1	3	1	1	3	3	3	3	3
BO/1 (Bow, Godfrey Gardens)	S	3	3	3	3	4	4	2	4	1	3	1	1	3	3	3	3	3
	M	3	3	3	3	4	4	2	4	1	3	1	1	3	3	3	3	3
	L	3	3	3	3	4	4	2	4	1	3	1	1	3	3	3	3	3
BO/2 (Bow, Iter Cross)	S	3	4	4	3	4	3	3	2	2	3	3	2	2	2	2	3	3
	M	3	4	4	3	4	3	3	2	2	3	3	2	2	2	2	3	3
	L	3	4	4	3	4	3	3	2	2	3	3	2	2	2	2	3	3
BO/3 (Bow, Junction Road)	S	3	3	4	3	4	3	3	2	2	3	3	2	2	2	2	3	3
	M	3	4	4	3	4	3	3	2	2	3	3	2	2	2	2	3	3
	L	3	3	4	3	4	3	3	2	2	3	3	2	2	2	2	3	3
CO/1 (Coppelstone, Bassett's Close)	S	3	3	3	3	4	4	4	3	1	3	1	1	3	3	3	3	3
	M	3	3	3	3	4	4	4	3	1	3	1	1	3	3	3	3	3
	L	3	3	3	3	4	4	4	3	1	3	1	1	3	3	3	3	3
CU/1 (Culmstock, Linhay Close)	S	3	3	3	3	4	3	3	2	1	3	1	1	3	3	3	3	3
	M	3	3	3	3	4	3	3	2	1	3	1	1	3	3	3	3	3
	L	3	3	3	3	4	3	3	2	1	3	1	1	3	3	3	3	3

CU/2 (Culmstock, Hunters Hill)	S	3	3	3	3	4	3	3	2	1	3	1	1	3	3	3	3	3
	M	3	3	3	3	4	3	3	2	1	3	1	1	3	3	3	3	3
	L	3	3	3	3	4	3	3	2	1	3	1	1	3	3	3	3	3
KE/1 (Kentisbeare, Village Hall)	S	3	3	3	3	4	3	3	2	1	3	1	1	2	2	2	3	3
	M	3	3	3	3	4	3	3	2	1	3	1	1	2	2	2	3	3
	L	3	3	3	3	4	3	3	2	1	3	1	1	2	2	2	3	3
MB/1 (Morchard Bishop, Greenaway)	S	3	3	3	3	4	4	4	2	1	3	1	1	3	3	3	3	3
	M	3	3	3	3	4	4	4	2	1	3	1	1	3	3	3	3	3
	L	3	3	3	3	4	4	4	2	1	3	1	1	3	3	3	3	3
SA/1 (Sandford, Village Hall)	S	3	4	4	3	4	4	3	2	1	3	1	1	3	3	3	3	3
	M	3	3	3	3	4	4	3	2	1	3	1	1	3	3	3	3	3
	L	3	3	3	3	4	4	3	2	1	3	1	1	3	3	3	3	3
WI/1 (Willand Moor)	S	3	3	3	3	4	3	2	2	1	3	1	1	3	3	3	3	3
	M	3	3	3	3	4	3	2	2	1	3	1	1	3	3	3	3	3
	L	3	3	3	3	4	3	2	2	1	3	1	1	3	3	3	3	3
WI/2 (B3181)	S	3	4	3	3	4	3	2	2	1	3	1	1	3	3	3	3	3
	M	3	4	3	3	4	3	2	2	1	3	1	1	3	3	3	3	3
	L	3	4	3	3	4	3	2	2	1	3	1	1	3	3	3	3	3

Impact of generic policies

6.8 The policies proposed in the Allocations and Infrastructure Development Plan Document are assessed in the tables below. They are assessed individually, unless otherwise stated, against the current situation (that is, without the policy). In some cases this would mean there is no relevant policy, in other cases, this comparison will be against the existing policy background such as a saved policy in the Local Plan. The table below sets out the impact on each objective, taking account of the impact indicators examined for each proposal. The Development Plan Document reference is given (all prefixed AL/).

Policy Reference	Timescale	A Biodiversity	B Landscape	C Heritage	D Water	E Land	F Air Quality	G Transport	I Climate	J Health	K Facilities	L Housing	M Deprivation	N Economy	O Diversification	P Employment	Q Retail	R Tourism
DE/1, Housing plan, monitor, manage	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	4	3	3	3	2	3	2	2	3	3	3	3	3
	L	3	3	3	3	4	3	3	3	2	3	2	2	3	3	3	3	3

The policy will help to ensure the provision of housing, including affordable housing, and is

likely to be most effective in the medium and long term. Accordingly, whilst likely to lead to the development of additional Greenfield land at the allocated contingency sites, it will support health and deprivation objectives.

DE/2 - 3 Affordable housing targets	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	3	3	3	3	2	3	2	2	3	3	3	3
	L	3	3	3	3	3	3	3	3	2	3	2	2	3	3	3	3

The slightly reduced target for sites from 40% to 35% reflects the reality of achieving affordable housing on sites, where 40% has not been achieved too often. Any reduction arising from this should be more than offset by the reduced thresholds for provision on market housing sites in urban and rural areas.

DE/4, Occupation of affordable housing	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	L	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3

This policy is unlikely to have a significant sustainability effect, broadly reflecting current practice.

DE/5 , Inclusive design and layout	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	L	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3

The policy reflects but strengthens current guidance set out in a Supplementary Planning Document, indicating no sustainability impact.

DE/6, Exceptions policy	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	L	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3

The policy is very similar to the Local Plan policy on the subject, indicating no sustainability impact.

DE/7, Gypsy and traveller pitches	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	L	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3

The policy reflects the national guidance on the subject, in a local context, and therefore no sustainability impact is likely.

DE/8 Public gypsy and traveller provision	S	3	3	3	3	3	3	3	3	1	3	1	1	3	3	3	3
	M	3	3	3	3	3	3	3	3	1	3	1	1	3	3	3	3
	L	3	3	3	3	3	3	3	3	1	3	1	1	3	3	3	3

The policy will support flexible provision for gypsies and travellers in Mid Devon.

IN/1, Community Infrastructure Levy	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	2	3	3	3	3	2	2	2	2	2	3	2	3	3	3	3
	L	2	3	3	3	3	1	1	1	2	2	3	2	2	3	2	2

The introduction of the levy will provide significant funding for key green infrastructure, air quality, transport, climate change mitigation and other key facilities in Mid Devon, particularly towards the middle and end of the plan period. Key benefits arise in Cullompton in terms of

air quality and town centre environment, which should have retail and tourism benefits over time.

IN/2, Development without infrastructure levy	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	L	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3

The policy broadly restates the current position, indicating no significant impact.

IN/3, Public open space	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	L	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3

The policy broadly restates the current position, indicating no significant impact.

IN/4, Green Infrastructure	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	
	M	2	2	3	3	3	3	2	3	2	2	3	3	3	2	3	3	2
	L	2	2	3	3	3	3	2	3	2	2	3	3	3	2	3	3	2

The provision of a green infrastructure strategy, supported by development and other funding, will have recreational, landscape and biodiversity benefits in the medium term, as any such strategy is implemented. Encouragement of walking and cycling should have health benefits and may support the tourism industry in the area.

IN/5, Education provision	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	L	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3

The policy broadly restates the current position, indicating no significant impact.

IN/6 Carbon footprint reduction	S	3	3	3	3	3	3	2	2	3	3	3	3	3	3	3	3
	M	3	3	3	3	3	3	2	2	3	3	3	3	3	3	3	3
	L	3	3	3	3	3	3	1	2	3	3	3	3	3	3	3	3

Subject to technical and financial viability, the policy will act to ensure that new development minimises its carbon emissions, the impact of this increasing through the plan period. In many cases, this will involve provision of more sustainable transport infrastructure.

MO/1 Monitoring	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	L	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3

On its own, this policy will have no impact. However, monitoring should help to ensure the effectiveness of other policies and proposals in achieving objectives.

CU/15, Cullompton air quality	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	L	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3

The policy should only act in the short term, to support air quality improvements in advance of the Community Infrastructure Levy, although the benefit of the additional funding raised should be felt throughout the plan period. However, as this policy will essentially provide additional support to one already in operation through a Supplementary Planning Document

the impact is not significant.																	
CU/16, M5 Junction 28	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	L	3	3	3	3	3	3	2	3	3	3	3	3	3	3	3	3
The policy should only act in the short term, to provide funding for junction improvements in advance of the Community Infrastructure Levy, although the benefit of the additional funding raised should be felt later in the plan period when the junction improvement is provided.																	
CRE/8, Air quality and link road	S	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	M	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
	L	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
The policy should only act in the short term, to support air quality improvements in advance of the Community Infrastructure Levy, although the benefit of the additional funding raised should be felt throughout the plan period. However, as this policy will essentially provide additional support to one already in operation through a Supplementary Planning Document the impact is not significant.																	

Impact of the Development Plan Document.

6.9 The overall impact of the Development Plan Document is arises from the impacts of the specific allocations and the policies it contains. The following table sets out a forecast of that overall impact. For each objective, the table below sets out a forecast impact in the short, medium and long term, followed by an explanation of the key drivers in that impact. As set out in the earlier section on methodology, this impact is set against the likely evolution of the area without this document. This likely evolution, referred to as the “no plan” approach, is referred to within the relevant explanations where appropriate. Secondary, cumulative and synergistic effects are also assessed and described.

Summary of overall impact					
Sustainability Receptor			S	M	L
Environment	A	Biodiversity, Flora and Nature Conservation	3	2	2
	B	Landscape	3	3	2
	C	Cultural Heritage	3	2	2
Natural Resources	D	Water	3	3	3
	E	Land and Soils	3	4	4
	F	Air Quality	3	2	1
	G	Traffic and Transport	3	2	1
	H	Waste	3	3	3
	I	Climatic Factors	3	2	1
Social Issues	J	Healthy and Safe Living Environments	3	2	2
	K	Access to Facilities	3	2	2

	L	Housing	3	2	2
	M	Consultation and Social Deprivation	4	2	2
Economic Issues	N	Economic Growth	3	2	1
	O	Rural and Urban Diversification	2	2	1
	P	Employment	3	2	1
	Q	Retail	3	2	2
	R	Tourism	3	2	2

Explanation of overall impact	
A	Allocations avoid damage to protected sites and incorporate policies and proposals to protect and enhance biodiversity. The major sites provide significant green infrastructure and cycling/walking infrastructure. The Community Infrastructure Levy or other interim policies will fund provision of green infrastructure and tree planting, with benefits for habitat and biodiversity. If strategies to reduce climate change are successful, which will require action across the world, then impact on biodiversity from that would be mitigated.
B	Allocated sites for development will inevitably have some landscape impact, but is likely to be less overall than a series of ad hoc Greenfield releases over the later periods of the plan due to specific mitigation criteria, such as significant green infrastructure provision at the larger sites. Green Infrastructure investment should have wider landscape benefits. If strategies to reduce climate change are successful, which will require action across the world, then impact on landscape character from that would be reduced.
C	There is likely to be limited impact from development compared with the “no-plan” scenario, as cultural heritage would be protected through appropriate policies in both situations. Support for Cullompton town centre enhancement would benefit that town’s heritage. A reduction in traffic and improvement in air quality in areas of Crediton and Cullompton arising from transport investment should produce heritage benefits. Similarly, if development is managed appropriately, improvements to town centres can lead to investment in heritage and other visual enhancements.
D	No impact likely.
E	Levels of Greenfield development will probably be slightly increased, particularly in middle to late phases of the plan, because of the policies to maintain housing supply and the avoidance of “planning by appeal”.
F	Significant improvements to air quality in Cullompton would arise from the strategy. Requirements for Low Emission Strategies in major developments in Tiverton and Crediton would lead to improvements in those towns.
G	Investment in transport infrastructure, including public transport and the Cullompton relief road, would lead to significant improvements in the medium to long term. Urban extensions provide greater on-site provision than the smaller sites which would otherwise come forward. The provision of additional local employment creates the opportunity for greater proportions walking and cycling to work, and for shorter commuting distances. Increases in tourism may involve greater travel to the area, but this is likely to be at a relatively low level.
H	No impact likely.

I	The policies and proposals will lead to significant reductions in carbon emissions, arising from provision of public transport and mixed use and low carbon strategies at the major developments, and from a significant increase in local employment provision in the main towns leading to reduced out-commuting. Enhancements to town centres, particularly Cullompton, should encourage greater local retail expenditure, therefore outflow of expenditure and the associated travel. Increases in tourism may involve greater travel to the area, but this is likely to be at a relatively low level.
J	Some improvements arising from increased local employment, affordable housing and cycling/walking infrastructure. Improvements in health from the air quality measures in Cullompton and Crediton and in Tiverton an additional GP surgery would be provided. There may be health benefits associated with access to biodiversity by the population. If strategies to reduce climate change are successful, which will require action across the world, then impact on health from that would be limited.
K	Some improvements arising from provision of facilities within urban extensions at Tiverton and Cullompton. Additional public transport investment will support improved access to nearby towns and cities, including Exeter. Increased rural tourism may have some beneficial effect on retention of local, particularly rural, facilities through increased local expenditure.
L	Provision of higher levels of housing and greater certainty of supply. Higher levels of affordable housing in the rural areas through the allocations, and some increase in affordable housing provision through lower site thresholds.
M	On balance, proposals of DPD likely to be unpopular initially, compared with unpopularity of later ad-hoc Greenfield releases. Provision of additional local employment and affordable housing should lessen deprivation in the medium to long term.
N	The strategy would significantly increase economic growth in Mid Devon, the impact increasing over time.
O	Rural diversification is likely to be boosted by the particular proposals at Bow and Kentisbeare, with continued rural economic development elsewhere. Diversification of the market towns' economies would be substantial. The impact of increased tourism should be beneficial in this respect, too.
P	Significant increases in local employment would arise.
Q	Recent developments and commitments have provided for local retail needs in large part; some improvements to Tiverton town centre should arise from the specific allocations. Traffic relief should bring retail benefits to Cullompton town centre by improving the shopping environment and encouraging greater footfall.
R	Potential for greater tourist growth through green infrastructure provision, and through improved Cullompton town centre.

7.0 Implementation

Proposals for monitoring

7.1 The Local Development Framework system is designed to be an on-going, iterative process. The monitoring of its effects is a legal requirement, through the production of Annual Monitoring Reports each December, in which a number of indicators will be measured and published. Four broad types of indicators are envisaged by the relevant Government Good Practice Guide:

- Process (the preparation of documents)
- Contextual (describing the social, economic and environmental background to the LDF).
- Output (the direct effects of the policies)
- Outcome (the general changes in society, economy and environment which are directly or indirectly linked to the implementation of the LDF).

7.2 Similarly, the SEA regulations require that the significant environmental effects of the plan or programme are measured. These indicators will have a considerable overlap with the output and outcome indicators referred to above, and therefore should be included where possible in the Annual Monitoring Report.

7.3 The following indicators are suggested as the basis for measuring the Allocations and Infrastructure Development Plan Document Significant Environmental Effects, many of which are also used to monitor the achievement of Development Plan policies. They are also set out in the Development Plan Document itself. The following list includes the indicators and targets contained in the Core Strategy, as the two documents of the Local Development Framework must be read together.

Indicator	Relevant Policies	Target	Implementation Agencies
Losses of employment land in local authority area (total hectares of B1a, B1b, B1c, B2 and B8).	COR1	No target.	Mid Devon District Council, development industry, businesses
Net density of new residential development.	COR1	Greater than 35 dwellings per hectare.	Mid Devon District Council, development industry
Indices of deprivation 2004 – numbers and proportions of wards within the most deprived 25% nationally.	COR1, COR3, COR4	10% improvement in the national position of these wards by March 2010.	Mid Devon District Council, Development industry, Devon County Council, Local Education Authority, Public transport providers, NHS, Devon Primary Care Trust and other health care providers

Expenditure on public open space from new development.	COR1, COR2, COR8, AL/IN/1 AL/IN/3	£100,000 per year.	Mid Devon District Council, town and parish councils, Sports England, private and voluntary organisations.
Community Infrastructure Levy	AL/IN/1	Introduced 2011; Income and expenditure from 2011.	Mid Devon District Council, Devon County Council, Highways Agency, Local Strategic Partnership?
Resident satisfaction with the standards of parks and play areas.	COR1 AL/IN/1 AL/IN/3	75% satisfaction rates.	Mid Devon District Council, General users
Number of Conservation Area Appraisals and Conservation Area Management Plans approved.	COR2	Complete coverage of Conservation Area Appraisals and Management Plans by 2009.	Mid Devon District Council
Change in areas of biodiversity importance,.	COR2	No net loss.	Natural England, Mid Devon District Council, landowners
Number of TPOs	COR2	No target.	Mid Devon District Council
Registered and Local parks and gardens	COR2	No loss.	Devon Gardens Trust, English Heritage, Mid Devon District Council
Housing trajectory showing net additional dwellings from 2006 – 2026, for whole District and separately for Tiverton, Cullompton, Crediton and Bampton.	COR3 COR12 COR13 COR14 COR15 COR16 AL/DE/1	Average annual completions Mid Devon 370 Tiverton 160 Cullompton 105 Crediton 40 Bampton 10	Development Industry, Mid Devon District Council
Affordable housing completions.	COR3 AL/DE/2 AL/DE/3 AL/DE/6	Average annual completions 100 per year.	Mid Devon District Council, development industry, registered Social landlords, Housing and Communities Agency.
Net additional gypsy and traveller pitches.	COR3 AL/DE/7	39 between 2006-2026	Mid Devon District Council
Sizes and types of	COR3	No target.	Mid Devon District

dwellings completed (Local Indicator).			Council, development industry
Strategic Housing Land Availability Assessment	COR3 AL/DE/1	To review the SHLAA annually.	Mid Devon District Council, development industry, infrastructure providers
Availability of land for housing.	COR3 AL/DE/1	At least 5 years supply.	Mid Devon District Council, development industry
Development of housing on allocated sites	COR3 AL/DE/1 All housing allocations		Mid Devon District Council, development industry
Total amount of additional employment floorspace by type (sqm Gross internal floorspace of B1(a), B1(b), B1(c), B2 and B8), for the whole district and individually for Tiverton, Cullompton, Crediton, Bampton and Elsewhere.	COR4 COR12, COR13, COR14, COR15, COR16, COR17, COR18.	Average annual completions: Mid Devon Tiverton Cullompton Crediton Bampton Elsewhere	Mid Devon District Council, development industry
Development of employment on allocated sites	All employment allocations		Mid Devon District Council, development industry
Number of VAT registered businesses	COR4	Growth each year.	Mid Devon District Council, Enterprise South West, Business Link, Private sector
Jobs density (number of jobs in Mid Devon divided by the resident working age population).	COR4	Increase jobs density to 1.0 by 2026.	Mid Devon District Council, development industry, business sector
Job Seekers Allowance as a proportion of working age population each April.	COR4	Remain below regional average.	Mid Devon District Council, development industry, business sector
Tourism visitor numbers	COR4	Increase year on year	Mid Devon District Council, Tourism industry, South West Tourism, Local TIC's

Tourist accommodation bedspaces	COR4	Increase year on year	Mid Devon District Council, Tourism industry, South West Tourism, Local TIC's
Total amount of floorspace for town centre uses, in total and within town centres. (Classes A1, A2, B1a and D2).	COR4, COR6	No target	Mid Devon District Council, development industry, retail business sector, leisure industry.
Development of retail on allocated sites.	All retail allocations		
Employment land available by type (hectares for B1a, B1b, B1c, B2 and B8).	COR4	At least 10 hectares allocated or with planning permission at any one time.	Mid Devon District Council, development industry
Renewable energy capacity installed by type. (Completed and available in megawatts)	COR5	No target.	Mid Devon District Council, renewable energy providers
Retail indicators	COR6	Show continuous improvement.	Mid Devon District Council, development industry, retailers
Total amount (and percentage) of employment floorspace on previously developed land by Type.	COR7	No target.	Mid Devon District Council, Development industry
Number and percentage of new and converted dwellings on previously developed land.	COR7	30%	Mid Devon District Council, Development industry
Percentage of residential completions within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and a major retail centre.	COR9	90%	Mid Devon District Council, Development industry, County Council, LEA, Public transport providers, NHS, Devon Primary Care Trust and other health care providers
Travel to work mode and distance travelled (2001 Census).	COR9	No target.	Census Devon County Council

Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.	COR11	No approvals.	Mid Devon District Council, Environment Agency, South West Water, Applicants
Air Quality in Cullompton	COR14 AL/CU/14 AL/CU/15	Improved air quality in Cullompton	Mid Devon District Council, Devon County Council
Air Quality in Crediton	COR15 AL/CRE/10	Improved air quality in Crediton	Mid Devon District Council, Devon County Council
Services in rural settlements.	COR17	No reduction in service availability in defined Villages.	Mid Devon District Council, development industry