



Local Plan
Review:
Options
Consultation

Interim
Sustainability
Appraisal

January 2014

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Appendix 1: Full review of plans and programmes

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1 Background

1.1 The Local Plan

1.2 Mid Devon's Local Plan sets the levels and distribution of development and strategic policies for the district. The document also sets out the infrastructure requirements needed to deliver the strategic objectives and states the policies by which development management decisions are made when determining planning applications. The existing Local Plan is made up of three parts:

- Core Strategy (adopted 2007)
- Allocations and Infrastructure Development Plan Document (adopted 2010)
- Local Plan Part 3: Development Management policies (adopted 2013)

1.3 Because the first part of the current plan was adopted seven years ago, it now needs to be brought up to date. The Council is therefore reviewing the targets, allocations, and policies contained within the current plan to reflect the latest evidence and guidance including the National Planning Policy Framework (2012). In reviewing the Local Plan, the Council has produced one document which will supersede the three parts of the existing plan. This new document, which is now out for consultation, is entitled 'Local Plan Review: Options Consultation'. The plan sets out the strategic options facing the district in terms of where new development could be located, and in what quantity. The Council will take account of the representations received during the Options Consultation to compile the final 'Submission' version of the Local Plan Review, which will contain preferred policies and allocations, and is scheduled to be made available in late 2014. It is anticipated that the final document will be adopted, following an 'Examination in Public' in 2015.

1.4 Purpose of the Sustainability Appraisal / Strategic Environmental Assessment Report

1.5 In order to be in accordance with EU and UK legislation, any plan must be subject to a Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA). SA/SEA (or SA for short) assists in promoting sustainable development through integrating sustainability considerations into plan making. It is an iterative, ongoing process and integral to plan making. The process helps to consider the effects of the plan (and the effect without the plan) on the environment, on people and on the economy. It helps planning authorities to consider the merit of a variety of options to help determine the most sustainable policy decisions.

1.6 The SA highlights potential negative impacts of a plan, thereby providing the opportunities for these effects to be avoided or mitigated. However, the SA cannot ensure that development will be absolutely sustainable in all its aspects. Where harmful effects are noted, the SA can help to demonstrate how they can be mitigated. It is possible that in some cases development which is in some respects less sustainable may still have to take place, perhaps where the social and/or economic benefits outweigh environmental impact.

1.7 Interim Sustainability Appraisal

1.8 This SA builds on the initial findings set out in the Sustainability Appraisal Scoping Report (July 2013) which accompanied the Local Plan Review: Scoping Report, which was the first stage in the preparation of an SA for the new Local Plan. As set out in Government guidance on applying SA, the Scoping Report involved setting the context and objectives, establishing the baseline and deciding on the scope as follows:

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

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

- Testing the plan objectives against the sustainability appraisal
- Developing plan options
- Predicting the effects of the plan
- Evaluating the effects of the plan
- Considering ways of mitigating adverse effects and maximizing beneficial effects

1.10 This SA sets out how these stages have been applied. It should be noted that this SA is only an interim report, having taken an initial assessment of the effects of the plan against the framework of indicators proposed within the scoping report. It includes a number of initial recommendations against each policy or site in order to mitigate their negative impacts or maximise the positive. The production of an interim SA, reflects the iterative nature of the appraisal process, and provides a basis against which policies and allocations can be continually assessed as the preparation of the Local Plan Review progresses. The final version of the SA will be produced alongside the Submission version of the Local Plan Review in late 2014. The final version will take account of any representations received during the consultation period regarding significant effects of the plan.

1.11 Compliance with the Strategic Environmental Assessment Directive and Regulations

1.12 The Environmental Assessment of Plans and Programmes Regulations (2004) set out certain requirements for reporting the SA process. The regulations specify that the SA report must set where it has met the SEA requirements. This is set down in the following table:

The SEA Directive requirements	Section within this SA that meets the requirement
Preparation of an environmental report in which likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are	The SA as a whole

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

2 Sustainability context

Review of relevant plans and programmes

- 2.1 The first stage of undertaking a sustainability appraisal involves identifying and taking account of other relevant policies, plans and sustainability objectives. The Local Plan will not be a document developed in isolation – its content will be influenced by a large number of factors and policies defined by EU or UK legislation, national policies and other plans and strategies at a local level. Understanding the relationship between the Local Plan and these policies is important as it will influence the options considered in preparation of the plan. Information on these relationships will reveal where there are shared objectives or inconsistencies and constraints to be addressed.
- 2.2 The Scoping Report undertook this review of plans and strategies and grouped them into theme areas. Many of the themes cut across each other, however to permit an analysis they have been collated under particular headings. **Only the conclusions from the review of relevant plans are contained below; the full review of plans and strategies can be found within appendix 1.** The review of the relevant plans and programmes, and the sustainability considerations has been updated to take account of the representations made by the Environment Agency and Natural England following the publication of the Scoping Report.

Air quality

- 2.3 All the air quality-related policies/strategies reviewed emphasise the need to reduce carbon emissions as a key action to mitigate the effects of climate change. Reducing emissions is also a requirement in areas that suffer from poor air quality, such as in Crediton and Cullompton. Reviewed policies also encourage increasing the use of low carbon vehicles as part of a strategy to reduce emissions. These messages must be clearly reflected within the new Local Plan. The document should ensure that new development does not unacceptably contribute to poorer air quality, and that opportunities for reducing emissions are incorporated. New development should encourage the use of sustainable modes of transport, such as walking, cycling or the use of public transport. New development should also help to promote the market for low carbon vehicles by ensuring the delivery of electric vehicle charging infrastructure, or other latest technological infrastructure needed for low emission transportation.

Biodiversity and green infrastructure

- 2.4 The biodiversity and green infrastructure plans and strategies reviewed have at heart the need to conserve and enhance biodiversity. Policies should avoid the deterioration of habitats, and look to preserve, restore and recreate priority habitats, with no net loss in priority habitats. Development should provide net gains in biodiversity where possible, balancing the economic and social needs of development with the objectives of bio- and geo-diversity conservation. Policies should also give consideration to biodiversity enhancing development. The Council should consider whether playing field provision can be provided by private as well as public means. Advice from the Environment Agency notes that environmental issues can best be managed at the strategic level.

Climate change mitigation and energy

- 2.5 The UK is committed to achieving targets in reducing greenhouse gas emissions in order to tackle climate change, and development has a significant part to play to help achieve these targets. Planning needs to minimise vulnerability to the impacts of climate change, and support the delivery of renewable and low carbon energy development. Improving the energy efficiency of the fabric of buildings, particularly by encouraging low or zero carbon energy sources will limit CO₂ emissions.

Community and wellbeing

- 2.6 The reviewed plans and strategies set out the importance of delivering an integrated approach to new development. Building mixed inclusive communities, around a strong neighbourhood centre, with a mixture of housing, economic uses, community uses and services is a priority. Access to services, the creation of safe neighbourhoods and the availability of local greenspace and quality education and leisure facilities for young people are vital in the creation of healthy, inclusive communities. The provision of accessible, adaptable properties also allows older residents or those with disabilities to remain in their communities, close to family and friends, rather than having to move as their needs change. Residents should be able to influence decisions that affect them.

Economy and economic development

- 2.7 The planning system should support the development of strong, sustainable and balanced economic growth. Opportunities for meeting the needs of local and inward investment should be met by facilitating the growth of local businesses, both urban and rural, and providing sufficient land for employment. There should be sustained investment in business and transport infrastructure to improve connectivity. The regeneration of the market towns of the district should be supported with a particular aim to reduce the number of empty shops.

Historic environment

- 2.8 The planning system should set out a positive strategy for the conservation and protection of the historic environment, considering the value it plays in delivering sustainable, distinctive places that are enjoyed by local people. A balance needs to be struck where the priorities of maintaining and enhancing the built environment are balanced against the district's development needs. The impact on heritage assets of development should be proportionally considered in relation to their significance, with the most important nationally significant assets being given the utmost protection.

Housing

- 2.9 Nationally the country has not been building enough homes to house its population, and therefore significantly boosting the supply of homes is a priority. The proportion of the population of people above retirement age has increased and there is a need to provide appropriate housing in response. Providing for an ageing population or people with disabilities may need to be addressed through the delivery of homes that can be adapted as peoples circumstances change, or through the delivery of extra care housing. A wide variety of house

types should be provided, across a range of tenures to meet the needs of the population. In response to the fact that house prices are nearly ten times local earnings, there is a need to provide affordable housing to address long social housing waiting lists and others with a housing need. Such issues are also acutely felt in some of the more rural locations of the district, where house prices may be even higher, and will need to be addressed through affordable housing delivery to meet an identified need. Provision for the needs of gypsies and travellers should be made planned for which seeks to balance their locational, economic and social needs with the protection of amenity and the environment. There is a need for modern homes to be environmentally sustainable, and meet the consumer demands of the population, including provision of sufficient storage space and private outdoor space.

Infrastructure

2.10 The reviewed plans and strategies highlight the importance of delivering infrastructure to meet the needs of existing and new communities. The Government places great importance on the delivery of the following infrastructure as part of ensuring sustainable economic development: transportation, flood protection, communications, research, energy and waste. Community facilities and schools are important infrastructural elements that are required to meet the needs of local communities as part of the delivery of sustainable development.

Land

2.11 Soil is a fundamental natural resource that has often been degraded by human action. Soils should be protected and enhanced. Planning should consider allocating or developing land with the least environmental value, prioritising lower quality land. Consideration of the soil quality of best and most versatile agricultural land, and the need to remediate contaminated land should be a planning consideration. When considering development, the use of land should be optimised across a site to ensure the efficient use of building footprints whilst setting a density of development appropriate to local circumstances.

Landscape

2.12 Devon has a unique and valued landscape, which also contributes towards the tourism attraction of the county. Mid Devon has borders that are adjacent or in close proximity to two National Parks, whilst the Blackdown Hills Area of Outstanding Natural Beauty crosses the east part of the district. Planning policies should protect valued landscapes, offering protection and enhancement of the most valued such as National Parks and AONBs. The protection of the landscape needs to be balanced against the challenge of mitigating the effects of climate change through the transition to a low carbon future, particularly achieved through the development of renewables technologies, which are often located in rural areas.

Minerals

2.13 There needs to be a sufficient supply of minerals to ensure the long-term ability to deliver infrastructure and development. The need for a supply of minerals needs to be balanced with the priority of protecting the environment. Planning for minerals extraction does not fall within the remit of Mid Devon District Council, being instead undertaken by Devon County Council. However, the consideration of the environmental impact of materials used in buildings and the

desire to promote locally sourced materials is a district issue, as is the effect on local communities who are in close proximity to mineral workings.

Rural areas

- 2.14 The population in rural areas has grown at a greater rate than urban areas in the last decade. Rural businesses make a substantial contribution to the economy and should be supported to grow. Agriculture remains an industry that has faced many challenges in recent decades and such enterprises should be supported to diversify in order to benefit the rural economy. Rural areas experience social issues such as poor access to services and facilities, whilst the growth of their economies may be hampered by poorer broadband speeds.

Transport

- 2.15 Reducing carbon emissions produced as a result of transportation is a national priority. This can be achieved by increasing opportunities for the use of sustainable modes of transport, such as public transport, walking and cycling; through the delivery of opportunities to increase the use of electric vehicles and improving the connections between various modes of transportation; improving the condition of the local transport network and protecting existing transportation assets. Ensuring safe and sustainable transport options are available to communities is also a priority.

Waste

- 2.16 National waste priorities are to protect human health and the environment whilst ensuring the delivery of sustainable waste management. Reducing the carbon footprint of waste will also contribute towards tackling climate change. New development should contribute to sustainable waste management, through the application of the waste hierarchy where disposal is the last resort, instead prioritising re-use, recycling or recovery.

Water

- 2.17 Managing flood risk and the effects of climate change is a key European, national and local priority, particularly as Mid Devon has suffered serious flooding in the past. There is also growing pressure on water resources and a need to improve resource efficiency. In particular new housing and commercial development should incorporate measures to improve water efficiency and reduce surface water run-off which can contribute to flooding. Water bodies should be protected from the effects of pollution, and there should be no reduction in their quality or status. Consideration should be given to the Water Framework Directive, and the objectives of the South West River Basin Management Plan when planning for development which could impact on the water environment.

Description of the area's baseline characteristics and future changes

- 2.18 The next stage undertaken within the Scoping Report involved focusing on collecting baseline information about Mid Devon. The information collected provides a basis for predicting and monitoring effects and helping to identify sustainability problems. The information collected is

drawn from a mixture of sources from national plans and strategies and combined with local monitoring data.

- 2.19 Much of the information represents generic data about the district, rather than specifically generated information in relation to the development of the Local Plan. Some of it will have been relevant in the production of previous local development documents, whilst other data will have been updated more recently. Some information may not be up to date, but may be the most recently available. The information provided covers a broad range of environmental, social and economic matters which collectively understood help to assess sustainability.

Location

- 2.20 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 117,800) and Taunton (63,000) are just beyond the southern and eastern boundaries of the district respectively. Major east-west transportation routes run through the district, including the M5, A361, A30 and the Great Western Mainline Railway.

Physical characteristics (including landscape)

- 2.21 The district of Mid Devon covers an area of 353 square miles (914 sq. km) in the heartland of Devon. It lies between Dartmoor, Exmoor and the Blackdown Hills. From the centre of the district, the north and south coasts of Devon are each about 30 miles away. The majority of Mid Devon's settlements are nestled within the folds of the landscape, with many small historic settlements containing thatched cottages and ancient churches. Tiverton is the main town within the district, with the two smaller market towns of Cullompton and Crediton.
- 2.22 The Mid Devon district forms the heart of the Devon countryside, linked to the south coast by the River Exe with its valley and surroundings. The intricate course of the River Exe is the most defining landscape feature in Mid Devon, providing a continuous thread flowing from the northern extremities of the district down to the south near Thorverton. To the east the Blackdown Hills have a unique geology and provide an often isolated and valued distinctive rural landscape.
- 2.23 The Culm Valley to the east is a low lying flat prosperous agricultural area, with good soil fertility. The north and northwest of the district is a high flattish landscape with a rather unsheltered windswept appearance, formed by the Culm Measures, so called for its underlying thin bed of coal known locally as 'Culm'. The farming hinterland to the north of Crediton, often referred to as the Mid Devon farming belt, has all the typical elements that make up the distinctive Devon landscape, with its varied patchwork of irregular shaped fields with green pastures.
- 2.24 Natural England has divided England into Natural Character Areas, with Mid Devon falling into three distinct areas: the Culm, the Devon Redlands and the Blackdowns. The Mid Devon Landscape Character Assessment provides further more localised characterisation. The Devon Redlands has a very strong, unified character. The underlying red sandstone and consequent red soil dominate the landscape through ploughed fields, cliffs and exposures, and are visually evident in the traditional stone and cob farmsteads, hamlets and villages that are scattered

across the area. Not only does the soil visually characterise the area but its fertility also makes it the agricultural heart of Devon.

Biodiversity and green infrastructure

- 2.25 The varied nature of Devon's geology and landform has led to a considerable range of biodiversity. There are various protected species found in Mid Devon, such as woodlark, bats and dormice. In comparison with the rest of Devon, Mid Devon has relatively little land designated as being of national importance and no designed or candidate European sites. Within Mid Devon there are 12 Sites of Special Scientific Interest (SSSI), three local nature reserves and two nature reserves managed by Devon Wildlife Trust. Mid Devon has over 8 sq. km. of ancient woodland. The district supports a range of important wildlife including over 200 County Wildlife Sites and Regionally Important Geological Sites.
- 2.26 Changes in wildlife populations and habitat have occurred throughout the last century and show a general trend of decline. The main threats to biodiversity include environmental pollution, land use change, fragmentation and invasive species introduction. These pressures are likely to continue and biodiversity may also be affected by climate change and recreational pressure. Hedgerow removal and unsympathetic conservation of rural buildings can impact on important species identified in the Devon Biodiversity Action Plan.
- 2.27 In particular the RSPB's State of Nature Report (June 2013) stated that 60% of species on which they hold data are in decline, whilst 31% have declined strongly. Half of the species assessed have also shown strong changes in abundance or distributing, indicating that recent environmental changes are having a dramatic impact on the nature of the UK's land and seas. In particular species with specific habitat requirements are faring worse than generalist species that are better able to adapt to a changing environment. Action needs to be taken to save nature for its intrinsic value and for the benefits it brings to us that are essential for well-being and prosperity.
- 2.28 Natura 2000 sites, which are hierarchically the most important sites for biodiversity, are protected under European legislation. Natura 2000 sites include Special Areas of Conservation (SACs) designated for species and habitats and Special Protected Areas (SPAs) designated for birds. Whilst there are no Natura 2000 sites within Mid Devon, there are six within 5km of the district's boundary. The six sites include:
- Hare's Down, Knowstone and Rackenford Moors (North Devon)
 - Exmoor Heaths (North Devon and West Somerset)
 - Exmoor and Quantock Oak Woodlands (North Devon and West Somerset)
 - Holme Moor and Clean Moor (Taunton Deane)
 - Quants (Taunton Deane)
 - South Dartmoor Woods (Teignbridge)
- 2.29 The Hare's Down, Knowstone and Rackenford Moors site is considered to be at greatest risk from development, due to its location on the A361 and proximity to the Mid Devon boundary. The A361 is the main route into North Devon from the M5 motorway, providing a vital tourism link as well as a certain amount of commuter and shopping traffic in either direction. Natural

England has advised that any development that encourages through-traffic may impact on the SAC.

- 2.30 There are many other elements that form part of the district's green infrastructure. These include 476 miles of Public Rights of Way and two regional walking routes (Two Moors Way in the west and Exe Valley Way from North to South). These routes are used recreationally by walkers, cyclists and horse-riders, but many rights of way provide short enough connections through and between towns and villages that they are realistic choices for people travelling to and from work and school.
- 2.31 The Environment Agency note that the local water environment performs a valued role in contributing to well-functioning ecosystem services. In Mid Devon there are a variety of rivers running through the district, including the Exe, Culm and Creedy, as well as a number of small contributory streams. These play a role as habitats and ecological networks for local biodiversity. The same applies to the Grand Western Canal, a County Wildlife Site.

Climate change mitigation and energy

- 2.32 Forecasting the future impact of climate change is particularly challenging, though there is extensive scientific evidence that the world's climate is changing. The UK Government has stated that if the global average temperature rises more than 2°C above pre-industrial levels, significant negative impacts of climate change will be more likely and the cost of managing them will rise sharply. To have a 50% chance of keeping climate change to within 2°C of pre-industrial levels, global greenhouse gas emissions need to peak before 2020 and then decline steeply. Evidence suggests at present emissions are continuing to soar. On 10 May 2013, concentrations of CO₂ in the atmosphere passed 400 parts per million, the highest level in 50 years of data collection, and a peak not estimated to have been experienced for three-five million years (the Pliocene period, a time when the arctic was ice-free and sea levels were 40 metres higher than today).
- 2.33 There are many risks associated with increasing climate change. These include threats to agriculture as a result of higher demand for water resources, reduction in productivity in farming or forestry land as a result of drought or conversely as a result of flooding. Businesses are likely to be effected by increased risk of flooding, competition for water, energy and materials and the disruption of transport networks and communication links. The flooding and resultant disruption to the Great Western Railway line near Stoke Canon in December 2012 highlights the potential impact on the region. The natural environment could be affected resulting in increased concentrations of pollutants in low water levels or reduced river flows damaging freshwater habitats and other ecosystem services; warmer rivers, lakes and seas impacting on biodiversity; flooding impacting on key habitats; ocean acidification affecting species and habitats and changes in seasonal events.
- 2.34 These effects will be experienced at a time when national energy reserves are declining. Much existing energy infrastructure is in the process of closing as it reaches the end of its operational life, whilst domestic fossil reserves of oil and gas are declining. The amount of spare electricity capacity in the system could fall from 14% (in 2012) to 4% by 2015/16 (Statutory Security of Supply Report, 2012).

- 2.35 To ensure there is sufficient energy to meet the UK's energy needs, and to mitigate the impacts of climate change there is a need to increase our reliance on low carbon technology. In the last few years this has resulted in increased delivery of renewable electricity generation in Mid Devon, typically in the form of large scale solar photovoltaic farms and to a lesser extent onshore wind turbines. To date there has been less development of renewable heat. Mid Devon has also been able to ensure the delivery of solar PV cells on the roofs of all local authority owned housing.
- 2.36 Whilst Government pays subsidies in the form of tariffs for renewable energy and maintains a positive approach to moving to low carbon energy sources, pressure for such developments within Mid Devon is likely to increase – particularly given the district's location (i.e. annually more sun in the south, and more wind as the area is exposed to the prevailing south westerly winds). However, this has implications for conflicts that may arise as a result of landscape impacts, particularly given the proximity to National Parks and the Blackdown Hills AONB. Historically, large-scale renewable energy developments have often been vocally opposed by local communities.
- 2.37 Mitigating the effects of climate change will also require the use of lower carbon resources in the construction industry, particularly as part of the development of houses and other buildings. Buildings will need to use fewer resources through the use of materials with a lower lifecycle carbon use, whilst simultaneously increasing energy and resource efficiency. Building regulations have been gradually amended to improve the energy efficiency of homes which will have affected the carbon output of recent new builds nationally. However, within Mid Devon, the delivery of homes which meet the higher categories of the Code for Sustainable Homes has not been a priority. This trend may start to be reversed as a result of new policies within the Local Plan Part 3 requiring all new major housing development to meet code level 3, rising to code level 5 by 2016. As the Local Plan progresses the housing standards that will be sought will depend on the outcomes of the 'Housing Standards Review' consultation which will set out a range of standards to be considered.

Community and wellbeing

- 2.38 The health of people in Mid Devon is generally better than the England average. However, life expectancy is 4.9 years lower for men in the most deprived areas of Mid Devon than in the least deprived areas. Over the last 10 years all-cause mortality rates have fallen. About 16.9% of Year 6 children are classified as obese, whilst levels of teenage pregnancy and smoking in pregnancy are lower than the England average. Priorities for Mid Devon include addressing healthy weight in childhood, cardiovascular skin disease, skin cancer prevention, alcohol use and smoking. The Council's Green Infrastructure Plan also recognises that access to public rights of way, playing fields and recreational open space is an essential aspect of public health and wellbeing.
- 2.39 Despite the impact of the recession, incidents of recorded crime have continued to fall year on year since 2007/08. Furthermore, the area is one of the lowest for recorded crime within Devon and Cornwall. Should the economic downturn continue it is unclear whether this pattern will be able to continue. Social deprivation, however, has increased across the district since 2007, with approximately 1,900 children living in poverty (Mid Devon Health Profile,

2012). Deprivation is highest in Tiverton, Cullompton and in some of the more remote rural areas.

Economy and employment

- 2.40 The majority of Mid Devon's employment falls within the service sector, which includes occupations where knowledge and time are offered to improve productivity. Examples include transport and distribution, retail and services such as accountants or building surveyors. This sector accounts for 76.7% of Mid Devon employment (Economic Trends Report, August 2012).
- 2.41 There are low levels of inward commuting and a strong 'pull' from neighbouring urban areas, especially Exeter. Forthcoming data releases from the 2011 Census will provide up-to-date information about travel-to-work patterns. The available information from the Annual Population Survey (2008) estimates that of the people working in Mid Devon, only 25% commute in from outside the district, while only 57% of Mid Devon's working residents stay in Mid Devon for work.
- 2.42 The district profile produced for the Local Economic Assessment (2012) found that there is a high level of self-employment within Mid Devon, and the district is above the Devon average for business density (number of businesses per working age person) and business start-ups. While school-level attainment is above average for the county, this does not translate to a highly skilled resident workforce, implying that high-attaining school leavers are not staying in Mid Devon.
- 2.43 The Council commissioned a Retail Study in 2012, to assess both demand and the capacity of the local catchment areas to support different sorts of retail growth. The report highlighted that Mid Devon's market towns are in a vulnerable position, similar to other small-medium sized towns across the country. The study identifies common trends, such as national retailers consolidating their businesses in larger regional centres, while internet shopping also takes trade away from town centre shops. Retail forecasts predict weak growth in spending, resulting in possible reductions in town centre retail space, with these effects potentially being most acutely felt in Crediton and Cullompton. Out-of-centre retail development may be most attractive to developers due to lower land values but may harm the existing town centres. Regeneration of the town centres, particularly as Tiverton is in receipt of government regeneration funding as part of the 'Portas Pilot' programme, is a priority, but one that faces significant challenges.
- 2.44 Tourism also represents a small but important sector within the district. Devon is a popular destination for domestic tourism, though traditionally Mid Devon has not been a significant recipient of tourism spend as visitors bypass the district en route to other parts of the county, particularly those areas closer to the coast. Previously, tourism development focused on the small scale provision of visitor accommodation, often on farms that were diversifying their activities. A Mid Devon Peer Challenge undertaken in early 2013 highlighted tourism as an economic area on which the district could capitalise. Further detail on the type of tourism offer that should be pursued will be presented by the forthcoming Tourism Study. It is likely this will prioritise modest sized developments seeking to capitalise on existing assets, such as the district's location and rural nature, including its proximity to two National Parks.

Historic environment

- 2.45 Mid Devon is a district with a rich historic and cultural heritage. There is a wealth of historic buildings and features throughout the district, with over 2680 listings of buildings, bridges and milestones. The district has three historic parks and gardens of national importance – Knightshayes, Bridwell Park and Shobrooke Park, with 16 of local value. The area also has 50 conservation areas and 49 scheduled ancient monuments, including castles, roman forts, stone crosses, bowl barrows, a henge, abbey, ring ditch, iron age earthworks, camps, a Romano-British villa, Neolithic causewayed enclosure and a hillfort. In addition there are a wide range of archaeological remains which are not scheduled.
- 2.46 The four main towns of the district all have a particular historic importance. Tiverton has its origins in a ford across the Rivers Exe and Lowman and has an attractive historic centre and a rich legacy of buildings of all periods. Crediton is a historic market town with medieval burghage plots that can still be discerned in the south side of the High Street. Cullompton is an old town with two grade I listed properties and some ninety grade II. Bampton was formerly a market town and has the mound of a former medieval motte and bailey castle.
- 2.47 However, whilst the heritage of the district is critical to local character, there is not comprehensive coverage of documents that provide an aide to protection. Of the 50 conservation areas, only 12 have conservation area appraisals and four have conservation management plans. Whilst the four main towns and a number of the larger villages are all covered, other villages and smaller settlements within the district have no coverage. Production of additional appraisals has slowed in recent years, with only two new CAAs adopted since 2008 (another is currently in draft). Cullompton has an Article 4 direction in place, which offers a degree of protection over and above that of the conservation area designation. Plans to put in place a similar directive in Bradninch were discussed but have not been adopted. There are currently 22 heritage assets in Mid Devon that are considered by English Heritage to be at risk of degradation for various reasons. The Heritage at Risk Register identified three conservation areas (Bow, Cullompton and Tiverton), two buildings and 17 scheduled monuments at risk.
- 2.48 There are also potential conflicts between the protection of heritage assets and mitigating the impact of climate change. In particular this is played out where home owners wish to install renewable energy features, such as solar PV arrays on roofs in a conservation area or on a listed building. Such developments may not positively contribute to local character or may reduce the significance of the heritage value of a building. This represents a potential conflict of sustainability objectives.

Land

- 2.49 Building on previously developed land, “brownfield land”, avoids the need to use greenfield land for new housing. In recent years, Mid Devon has developed a high proportion of new housing and employment on brownfield sites, with totals of 59% of new or converted housing and 57% of new employment development in 2011/12. This trend is not likely to continue as previously developed land is a finite resource, which is relatively scarce in a rural setting such as Mid Devon. Government policy encourages the effective use of brownfield land, provided that

it is not of high environmental value; however this approach is less strict than previous national policy. Conversely, national policy now provides less support for the long-term protection of employment land for development for alternative uses. This could mean existing brownfield land being used for housing, potentially reducing the overall amount of greenfield that needs to be allocated.

2.50 Government guidance also states that planning should consider the economic and other benefits of the best and most versatile agricultural land. A national grading system has been in place since the 1960s which classifies the quality of agricultural land based on factors based on soil, climate and site. At the time of original mapping the breakdown of grades within Mid Devon was as follows:

Grade	Percentage land coverage
1	3.48%
2	11.01%
3	64.44%
4	19.86%
5	0.05%
Non-agricultural	0.28%
Urban	0.89%

Source: MAFF (1966)

2.51 This mapping, produced by Central Government, has not been updated on a district-wide basis since it was originally commissioned. However, it is unlikely to have changed significantly despite the growth in urban areas in the last forty years and it highlights the very low levels of the best quality agricultural land available within the district. Any loss of this resource would need robust justification.

Minerals

2.52 Responsibility for minerals planning is a function of Devon County Council. However, Mid Devon is the setting for a number of locations of mineral extraction. Strategic mineral sites producing minerals of national importance or making a significant contribution to delivering sub-regional aggregates include the winning of limestone at Westleigh.

Population and housing

2.53 The release of data from the 2011 Census has shed new light on population trends in Mid Devon. In combination with other data sources, this helps to build a picture of changing household composition and long-term needs. The population according to the census is 77,750, an increase of approximately 11% upon the 2001 figure, a rate of growth that has risen faster than the rest of Devon, the South West and England. The median age of Mid Devon residents has also increased, from 41 to 44 reflecting both regional and national trends of a population that is living longer. The number of households within the district has also increased by 13% within the last ten years, reflecting not only population growth, but changing societal demographics such as older people continuing to live independently in their own

homes for longer and the growth in single parent households. Average household size has stayed consistent at 2.4 over the last decade.

2.54 House prices in Mid Devon are higher than the averages for Devon, the South West and England and Wales. While house prices have fallen slightly since the economic downturn, average 2011 were still 89% higher than they were in 2001 and there are signs that the ratio of house prices to earnings is rising again, with fewer people now in full-time employment.

2.55 Affordability remains a critical issue, and with the Mid Devon population having risen 11% between 2001 and 2011, there is a mismatch between the overall availability and the demand for affordable housing. The Mid Devon Local Housing Needs and Demand Survey 2011 indicated a need for 335 additional affordable dwellings each year to address the backlog of unmet need over the last 10 years. Over that 10 year period, total housing completions in Mid Devon averaged 349 dwellings per annum, the majority of these being market rather than affordable dwellings. Existing plans allocate sufficient land to meet the strategic target of 6,800 dwellings up to the year 2026, but other factors such as mortgage and developer finance availability will have had an impact on housing delivery since 2009.

2.56 The Council intends to commission a new Strategic Housing Market Assessment in partnership with some of our neighbouring district councils. This will provide definitive, up-to-date information on the level of housing need and demand across the Exeter Housing Market Area. Local planning authorities are required to cooperate with each other on strategic planning matters.

Resources

2.57 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. There has been much discussion about the notion of 'peak oil' in recent decades, the theory being that production of oil will peak in coming decades, with demand outstripping supply. Whilst there is academic disagreement on the reality of the peak oil theory, there is growing consensus that the age of cheap oil is coming to an end. Declining production of existing older oil fields will exacerbate production problems. As a result, more than two thirds of current crude oil production capacity may need to be replaced by 2030, simply to prevent production from falling. This is likely to be extremely challenging, and will likely result in necessary demand reduction and sourcing alternative sources of energy supply. Local effects of peak oil will include increased costs for fuel, with significant rises already having taken place, affecting motor vehicle users, but also passengers on public transport facing higher fare costs. As the government seeks to deliver a balanced future energy supply, there is likely to be greater desire to deliver renewable energy developments, with pressure particularly felt in rural areas for onshore wind and solar farms.

2.58 There is also uncertainty over the future supply of phosphorus, which is an essential ingredient in fertilisers, and plays a critical role in contributing to modern agricultural production. Some researchers have predicted that phosphorus reserves are expected to be completely depleted within 50-100 years, though this is not universally agreed. Such reductions will have a significant impact on farming productivity, land use and food supply.

2.59 Water is essential for human life and to sustain a diverse and thriving water environment. It is important to our economy as an essential requirement for industry, power generation, commerce and agriculture. Over the next 30 years, there will be increasing pressures from rising populations and associated development. Looking further ahead, the impact of climate change could have a major impact on water that will be available for all uses.

Rural areas

2.60 National government statistics classify Mid Devon as a 'Rural-80' based on the location of the local population. This statistic refers to the fact that over 80% of the population are resident in rural settlements (including those with urban areas with between 10,000 and 30,000 population regarded as 'larger market towns'). Classifying Mid Devon as a 'Rural-80' local authority puts it in a category of the most rural local authorities within the UK.

2.61 Rural businesses are a key element of the local economy. There is a growing trend for individuals to set up their own businesses, particularly in rural areas where areas such as Mid Devon can provide a high quality of life and where transport costs and distances can encourage home-working. Broadband access and speeds can be a key issue for rural-based businesses. A programme to connect Devon and Somerset with superfast broadband is underway which will result in speeds of at least 24Mbps to at least of 85% of homes and businesses by 2015. However, many rural areas currently receive less than 2Mbps at present, which may hinder the start up or expansion of rural businesses.

2.62 Access to services is also an issue for rural areas. Statistics for the whole of Devon show a decrease in the number of households within good transport access to key services or work. Levels of public transport providing services to 55 villages in Mid Devon have shown a decrease since 2006. In particular the number of daily services to these settlements has shown a steady decline across this period.

Transport and air quality

2.63 As a rural area, Mid Devon has a high dependency on the car, particularly as public transport provision and coverage is far from extensive, and has shown signs of contracting. These factors are reflected in the level of car ownership, which has increased at both national and local levels. The average household in Mid Devon now owns 1.47 cars, as opposed to 1.33 at the time of the previous census. The percentage of households owning 2, 3 and 4 or more cars has all increased, whilst the share of those who do not own a car has fallen. In particular, the ratio of cars owned per household in Mid Devon has continued to grow at a consistent rate whilst growth in the national level has shown signs of levelling off. High levels of car ownership have not been affected by planning policies to restrict parking provision in recent developments. This has led to inappropriate or anti-social parking, rather than a reduction in car ownership. Future developments should make suitable provision for parking in order to reflect the rural nature of the district and levels of ownership. Neither does it appear that higher fuel costs have had an effect on car ownership, though high levels of ownership do not always translate into high levels of usage.

2.64 High levels of car ownership and hotspots of poor local road infrastructure have impacted on local air quality. Both Cullompton and Crediton were designed as Air Quality Management Areas in 2006 and 2004 respectively. Principal actions to address the excessive levels of Nitrogen Dioxide and particulates in the air include the development of the Crediton Link Road and two relief roads within Cullompton. Work to provide the Crediton Link Road has already commenced, however to date there has been no progress on new roads in Cullompton. Funding is being provided by Central Government to undertake improvements to both junctions 27 and 28 of the M5, however this may only reduce some of the congestion experienced at the Cullompton turn-off.

Waste

2.65 National policy on waste prioritises reduction, re-use or recycling in order to prevent waste going to landfill. Local authorities will experience increasing costs as a result of waste going to landfill, which will need to be reduced by using alternative methods of waste management, particularly given the severe pressures that are on Council finances as a result of Central Government funding cuts. There are also implications for climate change as a result of how waste is managed. In many cases carbon acts as a good proxy for the overall environmental impacts of waste: generally speaking, the higher up the waste hierarchy waste is treated, the smaller the greenhouse gas impacts.

Water

2.66 Mid Devon has suffered serious flooding in the past, and the risk of flooding is likely to increase in the future as a result of climate change. Forward planning must take account of this risk to ensure that new development is sustainable. Winter rainfall is predicted to increase by 15-30% by the 2080s as a result of climate change, with a concomitant 20% rise in peak river flow. Impermeable surfaces of buildings, roads and pavements limit infiltration and increase the volume and rate of surface water runoff. Future development may increase the area of impermeable surfaces unless a sustainable approach to water management is adopted that promotes sustainable urban drainage and improved water efficiency within buildings. A new Strategic Flood Risk Assessment will need to be commissioned once options for future development have been produced. The conclusions from this assessment will need to be used in determining the final strategic and site-specific options in the Local Plan. The assessment will need to consider the status of Mid Devon's existing waterbodies in relation to the Water Framework Directive, and ensure that the priorities of the South West River Basin Management Plan are reflected in the final conclusions.

Sustainability issues and problems

2.67 The next stage undertaken within the Scoping Report involved the identification of any sustainability problems that relate to Mid Devon. These issues will have been highlighted as part of the review of relevant plans and programmes and the baseline data for the district set out earlier in this document. The initial list may expand further as a result of consultations undertaken as the Local Plan is prepared. The issues identified will also inform the sustainability objectives which form the basis of the framework to appraise the Local Plan strategy and policies as set out in the next section of this document.

2.68 This scoping report has highlighted the following sustainability issues within Mid Devon:

- Small areas of social deprivation within Tiverton, Cullompton and some of the remote rural areas (including high levels of child poverty)
- Large population growth within the last decade and demographic household change leading to the need for new housing, particularly affordable housing given the high ratio between prices and local earnings
- Houses have not previously been constructed of a sufficient size to meet the needs of the modern family
- Access to services and facilities for rural communities has worsened and may continue to do so
- Biodiversity levels continuing to fall, often dramatically for some species
- Low levels of the best quality grade 1 agricultural land across the district
- Pressure to develop primarily on greenfield sites as fewer brownfield sites remain or require costly remediation
- The need to avoid disposal of waste, instead prioritising re-use, recycling or reduction
- Rich historic environment across the district, though some heritage assets at risk
- Climate change objectives can conflict with the conservation of the area's historic environment, particularly in the installation of renewables technologies that may impact on heritage assets
- Pressure for the installation of renewable energy developments to meet energy shortage
- Increased risk of flooding as a result of climate change
- Potential for negative impact on the Water Framework Directive status of waterbodies across the district as a result of development
- Low delivery of low or zero carbon homes to date
- High car dependency across the district, with levels of car ownership having grown and continuing to grow
- Traffic congestion and poor air quality within Crediton and Cullompton
- Low levels of inward commuting but strong out-commuting, especially to Exeter and the potential loss of employment within Mid Devon
- Low retention of high-attaining school leavers
- Rural self-employment or small business start-up is a growing sector, however this may be constrained by poor broadband speeds
- Declining town centre health with town centre regeneration having the potential to be affected by any new out-of-centre development

3 Sustainability appraisal methodology

Developing the plan and options

- 3.1 This is the second consultation that has taken place as part of the preparation of the Local Plan Review. The initial consultation, undertaken during July and August 2013, set out the scope of the review and the issues facing the district, and sought feedback on the broad direction of development for the district over the next 20 years. That consultation included no policies or sites. The current consultation sets out the options available to the district, including a range of strategic options in terms of where growth is focused over the next twenty years. A range of sites across the district where this growth could be located have also been included. The sites presented are options only, with the Council having stated no preference for the strategic decisions that will need to be taken.
- 3.2 This SA accompanies the Local Plan Review, providing an assessment of the sustainability impacts of the policy options. The SA will be updated following the consultation period to take account of the responses received during the consultation. Natural England and the Environment Agency made a number of recommendations about the content of the Scoping Report. These have been incorporated into this version of the SA. In summary, their responses stated the following:
- The document should include and take account of National Character Areas, which are currently being revised by Natural England (links to the relevant profiles were provided)
 - Environmental issues should be addressed at a strategic level, with a holistic approach being applied to all biodiversity and green infrastructure needs
 - The plan should recognise the importance of land management and its implications for the ecological quality and status of a river
 - Access to open green space should be referenced in relation to community and well-being
 - Reference to water as a resource should be included
 - A Strategic Flood Risk Assessment should be undertaken in parallel with the revised Local Plan. Information regarding the Water Framework Directive status of waterbodies in Mid Devon should be included, with reference to the South West River Basin Management Plan
 - The framework of indicators should be updated to consideration of impacts on the following indicators: 'resilience to climate change' and 'water resources'
 - The Mid Devon Green Infrastructure Assessment, the South West River Basin Management Plan and the Water Framework Directive should be added to the list of relevant plans and programmes
- 3.3 The Local Plan Review: Options Consultation contains a range of strategic policy options and sites. It contains more sites than the Council will need to allocate. Some of the sites are listed as preferred sites. These have been stated as preferred as they are already allocated, and therefore have been subject to public consultation and Examination in Public as part of the process for adopting the Allocations and Infrastructure Development Plan Document (AIDPD) in 2010. It is therefore the Council's intention that they should be carried forward into the new Local Plan. The sustainability of these sites has previously been subject to appraisal alongside the preparation of that document. Though stated as preferred, they are still to be subject to

ongoing sustainability appraisal and consultation as part of the process of preparing the new Local Plan.

Sustainability appraisal framework of indicators

- 3.4 A framework is used to understand the sustainability effects of the Local Plan as it is being developed. This framework is central to the process of sustainability appraisal. A framework has been developed consisting of sustainability objectives, each of which includes a number of elements against which a policy will be appraised. The framework includes all those factors highlighted within the Scoping Report that will affect the sustainability of the Local Plan.
- 3.5 The framework below represents a more simplified approach than that used in previous Mid Devon SAs. This approach is considered to offer greater flexibility as the draft Local Plan contains both high level strategic policies, site allocations and detailed policies to guide development management decisions. This new framework can be applied to all these policies equally.

Sustainability objective	Elements covered	Impact
A) Protection of the natural environment	Habitats and biodiversity; flora and fauna; protected species; landscape	
B) Protection and promotion of a quality built environment	Heritage assets, including listed buildings, conservation areas, scheduled ancient monuments, registered parks and gardens, locally listed assets, archaeology; design and quality of development	
C) Mitigating the effects of climate change	Reduced flood risk; promotion of low carbon or renewable energy; reductions in carbon emissions; resilience to climate change; walking and cycling provision; low carbon buildings	
D) Safeguarding and minimising resource use	Quality of soils, including contaminated land; water quality, including consideration of water framework directive objectives; water resources; minimisation of waste; impact on best and most versatile agricultural land	
E) Promoting economic growth and employment	Increasing jobs; reducing out-commuting; skills training; growth of rural businesses; tourism provision	
F) Supporting retail	Safeguarding the vitality and viability of town centres; relationship between new development and town centres; supporting viability of shopping facilities in villages	
G) Meeting housing needs	Supply of housing; housing mix; house size; housing affordability; appropriate housing density to location; proximity to services and facilities	
H) Ensuring community health and	Community support for proposals; access to open space and recreation; limiting air, noise and light pollution to levels that do not damage human health or natural systems; integrated	

Sustainability objective	Elements covered	Impact
wellbeing	and sustainable forms of travel including walking, cycling and public transport; social deprivation; safe and secure environments	
I) Delivering the necessary infrastructure	Roads and transportation; schools; health services; community facilities; green infrastructure; telecommunications	

3.6 The sustainability objectives proposed are distinct from the objectives of the Local Plan, though they may in some cases overlap with them. They will provide a way of checking whether the Local Plan objectives are the best possible ones for sustainability and will test the social, environmental and economic effects of the plan. The indicators are not fixed, and can be amended, if required, in response to input received as a result of the Preparation stage consultation exercise.

3.7 In order to consider the impact of the Local Plan against the sustainability objectives, a scoring system is proposed to be used. A score will be provided against each of the objectives to highlight a policy or proposal's sustainability impacts. Collectively, this will allow consideration of a policy's overall impact and permit comparison with other policies or proposals. Where negative impacts are highlighted, it will also permit proposals or policies to be modified and then rescored in order to determine whether their sustainability impacts have been made more positive.

3.8 The use of a scoring system with a range from +3 to -3 will highlight the scale of any potential impact. This offers more scope than the approach taken in the most recent SA of the Local Plan Part 3 where only a positive, negative, zero or indeterminate outcome could be used – a system which could not easily differentiate between a marginal or significant impact.

3.9 The following table sets out the scoring system that has been used:

Score	Rationale
+3	The policy/proposal will have a significant positive contribution towards achieving the objective
+2	The policy/proposal will have a positive impact in contributing towards achieving the objective
+1	The policy/proposal will have a minor positive impact in contributing towards achieving the objective
0	The policy/proposal will have no impact or will have some positive and some negative impacts thereby having a balanced effect in contributing towards achieving the objective
-1	The policy/proposal will have a minor negative impact in contributing towards achieving the objective

-2	The policy/proposal will have a negative impact in contributing towards achieving the objective
-3	The policy/proposal will have a significant negative contribution towards achieving the objective

3.10 In addition to the scoring process, a summary of information against each indicator has been provided. This summary describes the impact against each of the sustainability objectives, setting out the nature of the impact, how each is experienced and whether any of the impacts noted are offset by other effects of the policy. It also sets out mitigation measures that have been applied to reduce, where possible, any negative impacts identified. The nature of impacts, whether they are secondary, cumulative, synergistic, temporary, permanent, short, medium or long-term is also considered.

3.11 Below each policy a summary of recommendations has also been set out. These reflect recommendations that have arisen as a result of applying the SA process to each policy. These recommendations, form advice provided by the SA but they have not been incorporated in the policies at this stage. They reflect the iterative nature of the SA process, and may be used to amend the policies during the preparation of the final version of the Local Plan.

3.12 The assessment of all policies and potential sites can be found in Appendix 2.

Sustainability Appraisal Omissions

3.13 Mid Devon is considering including a policy on self-build housing also known as custom build housing which could also include community-led housing projects to provide affordable homes for the benefit of the community. Should the Council choose to introduce a new policy on these matters a corresponding Sustainability Appraisal will be undertaken which will form part of the final version of the SA.

3.14 Mid Devon also seeks views on a number of Local Green Space designations intended to preserve smaller open areas within or near to settlements for the long term because of the special associations that a place has for the local community. These designations have not undergone Sustainability Appraisal as they are designated under the National Planning Policy Framework (NPPF) rather than being a local policy decision.

4 Next steps

- 4.1 During the consultation period, representations on the contents of the Local Plan Review and this accompanying Sustainability Appraisal are invited. Representations can be made by any interested party on the policies as set out within the Local Plan Review, or the effects of these policies contained in the SA. The Council will take account of these representations following the consultation period. These will help inform the final draft of the Local Plan Review, which the Council anticipates will be made available for a final consultation period late in 2014. Details of how to make a representation can be found on the Local Plan Review page, on the Council's website, which can be found at:

www.middevon.gov.uk/localplanreview