



Local Plan  
Review:  
Proposed  
Submission  
Consultation

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Sustainability  
Appraisal

February 2015

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## Contents

1. Background	3
2. Sustainability context	8
3. Sustainability appraisal methodology	26
4. Reasons for selecting/rejecting policy alternatives	30
5. Monitoring	70
6. Conclusions	76
Appendix 1: Full review of plans and programmes	77
Appendix 2: Sustainability appraisal of policies and site options	108
Appendix 3: Undeliverable site options	675

# 1 Background

## The Local Plan

1.1 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)

1.2 Because the first part of the current plan was adopted seven years ago, it now needs to be brought up to date. The Council has therefore reviewed 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 entitled ‘Local Plan Review: Options Consultation’ (or Options Consultation), was out for consultation February – March 2014. 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 has taken into account the representations received during the Options Consultation to compile the Local Plan Review Proposed Submission 2013-2033 (or Local Plan Review), which contains preferred policies and allocations. An outline of the contents of the Local Plan Review is set out below:

Chapter 1.0	Introduction
	Preparation of the Local Plan
	Vision, Spatial Strategy and Key Diagram
	Neighbourhood Planning
	Superseded Policies
Chapter 2.0	Development Strategy and Strategic Policies
	S1 Sustainable development priorities
	S2 Amount and distribution of development
	S3 Meeting housing needs
	S4 Ensuring housing delivery
	S5 Public open space
	S6 Employment
	S7 Town centres
	S8 Infrastructure
	S9 Environment
	S10 Tiverton
	S11 Cullompton
	S12 Crediton
	S13 Villages
	S14 Countryside
Chapter 3.0	Site Allocations
	Tiverton (Sites TIV1-TIV15)

	Cullompton (Sites CU1-CU21)
	Crediton (Sites CRE1-CRE11)
	Rural Areas (23 Sites BA1-WI2)
Chapter 4.0	Managing Development (DM1 – DM29)
Chapter 5.0	Monitoring
	Annex 1 Glossary
	Annex 2 Low Emission Assessments:
	Proposed Submission Policies Map

1.3 The following sets out the vision and main objectives of the Local Plan Review:

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 with appropriate infrastructure 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 ‘fit for purpose’, decent homes which people can afford
- Safe, healthy and crime free neighbourhoods
- Active, involved, well-educated citizens
- A good range of opportunities to travel by active and sustainable modes
- Strong town and village communities
- Green Infrastructure for personal leisure amenity space

**Support sustainable economic success**

- A good range of jobs in urban and rural areas
- Growth that respects Mid Devon’s relationship with Exeter and Taunton
- Profitable and expanding local businesses, attracting inward investment
- Attractive, lively and successful town centres
- Tourism and leisure enterprises that benefit the whole district
- Recognition of the role of heritage as a tourism attraction

**Conserve and enhance the area**

- High quality design in new developments
- Clean air and water
- Countryside, environment and heritage assets conserved and enhanced
- Attractive countryside providing for biodiversity and employment
- Effective reuse of existing buildings
- Conservation and enhancement of protected landscapes

**Respect environmental limits**

- Social and environmental benefits of development are optimised
- Developments use land, energy and resources effectively

- Waste is minimised and recycling rates are high
- Public transport, walking and cycling are encouraged
- Floodplains remain undeveloped
- Renewable energy projects within environmental limits

1.4 It is anticipated that the final document will be adopted, following an 'Examination in Public' in 2015.

#### **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. 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.

#### **Sustainability Appraisal Process**

- 1.7 The Sustainability Appraisal Scoping Report (July 2013) (or SA Scoping Report) which accompanied the Local Plan Review: Scoping Report (or Scoping Report) was the first stage in the preparation of an SA for the new Local Plan Review. As set out in Government guidance on applying SA, the SA 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
- 1.8 The interim Sustainability Appraisal (January 2014) (or interim SA) built on the initial findings set out in the Scoping Report SA. This was the next stage of preparing the SA which involved the developing and refining of options and assessing their effects. Government guidance on undertaking a SA defines this stage as including the following aspects:
- Testing the plan objectives against the SA
  - 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

- 1.9 The interim SA undertook 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, reflected the iterative nature of the appraisal process, and provides a basis against which policies and allocations could be continually assessed as the preparation of the Local Plan Review progressed.
- 1.10 This document is the proposed submission version of the SA and has been produced alongside the proposed submission version of the Local Plan Review. The proposed submission version has taken account of any representations received during the consultation period regarding significant effects of the plan. This SA sets out the SA process and how it complies with the SEA Directive, the sustainability context, sustainability methodology, an outline for the reasons for selecting or rejecting alternatives and the measures envisioned to monitor them.
- 1.11 The appendices outline in more detail the contents and main objectives of the plan and the relationship with other plans and the likely significant effects on the environment of policy options including measures envisaged to present, reduce and as fully as possible offset any significant adverse effects on the environment. A non-technical summary of this information is also provided.

**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:

<b>The SEA Directive requirements</b>	<b>Section within this SA that meets the requirement</b>
Preparation of an environmental report in which likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated	The SA as a whole
a) An outline of the contents and main objectives of the plan and the relationship with other 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 protection objectives, established at	Section 2 and Appendix 1

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	
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 prevent, 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	Sections 3 and 4
i) A description of the measures envisaged concerning monitoring	Section 5
j) A non-technical summary of the information provided under the above headings	Non-technical summary

## 2 Sustainability context

### Review of relevant plans and programmes

- 2.1 The Local Plan Review has not been developed in isolation – its content has been 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 Review and other plans is important as it has influenced the options considered in preparation of the Plan. Information on these relationships has revealed where there are shared objectives or inconsistencies and constraints to be addressed.
- 2.2 Plans and strategies have been reviewed and grouped into theme areas. The SA has taken into account the latest guidance available and representations made following the publication of the Scoping and the Interim SA Reports. Many of the themes cut across each other, however to permit an analysis they have been collated under particular headings as set out below. **Please note 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.**

### *Carbon reduction and air quality*

- 2.3 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 Review. 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. Policies should not adversely affect the integrity of European sites either alone or in combination with other plans as set out in the Habitat Regulations published in 2007, updated in 2010 and again in 2012.

### *Climate change mitigation and energy*

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.

### ***Community and wellbeing***

- 2.5 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 green space 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 and have sufficient space for activity, privacy, circulation and storage in their homes.

### ***Economy and economic development***

- 2.6 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***

- 2.7 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 on development should be proportionally considered in relation to their significance, with the most important nationally significant assets being given the utmost protection.

### ***Housing***

- 2.8 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 the lower quartile house prices to lower quartile earnings ratio for 2013 was 8.37 (DCLG 2014) 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 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***

- 2.9 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. It is recommended that all future allocations are assessed in terms of their impact on the Strategic Road Network and whether they comply with sustainable transport policy objectives and relevant guidance.

### ***Land***

- 2.10 Soil is a natural resource that can be degraded by human action. Planning should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, poorer quality land in preference to that of a higher quality should be sought. The need to remediate contaminated land should also be a planning consideration.

### ***Landscape***

- 2.11 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 (AONB) 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***

- 2.12 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. Minerals resources should also be protected from the sterilisation by development where these minerals are needed in the long term.

### ***Rural areas***

- 2.13 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***

- 2.14 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***

- 2.15 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***

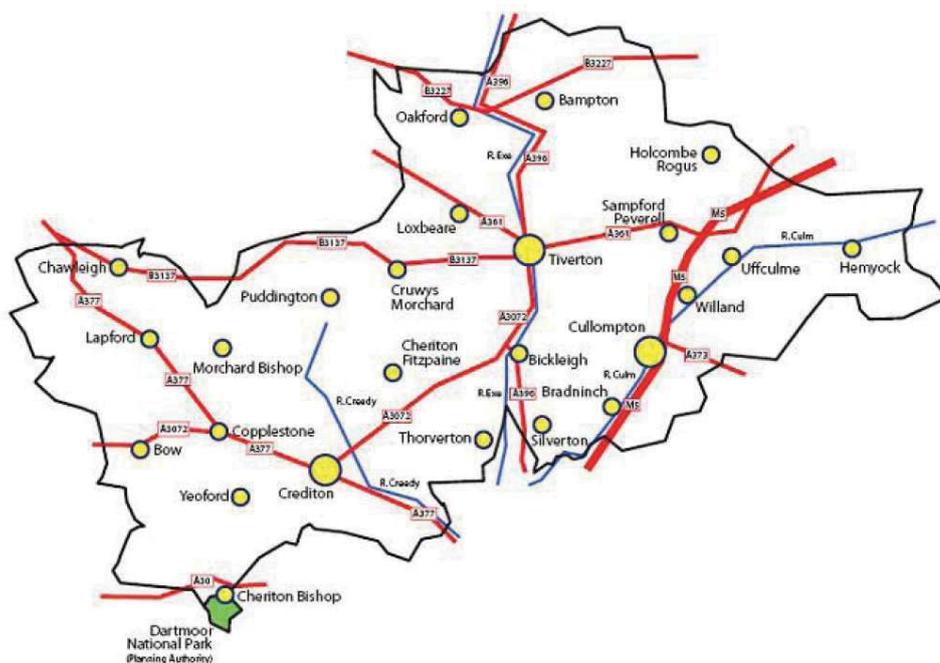
- 2.16 Managing flood risk and the effects of climate change is a key European, national and local priority, particularly as Mid Devon has suffered serious flooding in the past. In particular new housing and commercial development should incorporate measures to improve water efficiency and reduce surface 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.

### **Mid Devon's baseline characteristics and future changes**

- 2.17 The collection of baseline data is a key component of the SA process to help establish a picture of the District. 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.
- 2.18 Much of the information represents generic data about the district, rather than specifically generated information in relation to the development of the Local Plan Review. 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 recent available. The information provided covers a broad range of environmental, social and economic matters which collectively understood help to assess sustainability.

## Location

- 1.1 Mid Devon is an inland area in the south west of England, lying roughly equidistant between the Bristol and English Channel coasts. The Strategic Road Network provides good connections to Tiverton and Cullompton and access to larger urban areas outside the district including Exeter (population 117,800) and Taunton (63,000) which are just beyond the southern and eastern boundaries of Mid Devon and provide additional opportunities for work and higher education. Significant transportation routes such as the M5 motorway and the Great Western Rail Line provide good connections to the rest of the UK including London.
- 1.2 The district is one of the most sparsely populated local authority areas within England and Wales, with a large number of residents living outside of the three largest towns. The principal concentration of people is in the eastern part of the district, where the market towns of Tiverton and Cullompton lie within 6 miles of each other. Crediton is the largest settlement in the west of the district.



## Physical characteristics (including landscape)

- 2.19 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 landscape's strong rural characteristics complements a historic sense of place, with medieval field patterns interspersed within the productive agricultural landscape, broken by tracts of internationally important Culm grasslands and scattered traditional settlements typically associated with Devon. 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.
- 2.20 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. Most of the district's rivers drain southwards in steep-sided valleys into large expansive floodplains. The market towns of the district have typically evolved as riverside settlements. 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.

- 2.21 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.
- 2.22 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***

- 2.23 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.
- 2.24 To the east of the district lies the Blackdown Hills AONB, this is highly valued not only for its visual qualities but also for its geology, biodiversity and human heritage. The Blackdown Hills support species and habitats such as purple moor grass and rush pastures that are in rapid decline in the UK. The North Devon Biosphere Reserve transition area also covers part of Mid Devon.
- 2.25 Changes in wildlife populations and habitat have occurred throughout the last century and show a general trend of decline. Many of Devon's habitats are small and fragmented and their health is threatened due to a range of issues. 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.
- 2.26 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.

2.27 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. A Habitat Regulations Assessment (HRA) has been undertaken for the Local Plan Review which considers the impact of the Plan on Natura 2000 sites. Consideration is also provided to potential SPAs, candidate SACs, Sites of Community Importance and Ramsar sites. For ease of reference, these designations are collectively referred to as European sites despite Ramsar designations being at the international level. Whilst there are no European sites within Mid Devon, there are eleven within 10km of the district's boundary. The eleven sites are as follows:

- East Devon Pebblebed Heaths (SAC)
- Culm Grasslands (SAC)
- South Dartmoor Woods (SAC)
- Home Moor and Clean Moor (SAC)
- Dartmoor (SAC)
- Exmoor Heaths (SAC)
- Quants (SAC)
- Exmoor and Quantock Oakwoods (SAC)
- Exe Estuary (SPA)
- East Devon Heaths (SPA)
- Exe Estuary (Ramsar Site)

2.28 The Culm Grasslands 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 through air pollution. This has been considered by the HRA for the Local Plan Review which concludes that the development proposed in the Local Plan Review alone will not result in adverse effects on the integrity of European Sites around Mid Devon. However uncertainties exist regarding the potential for the North Devon and Torridge Local Plan to have significant effects on the integrity of the Culm Grasslands SAC as a result of increased air pollution. Therefore it is not yet possible to conclude that there will be no likely significant effects as a result of implementing the new Mid Devon Local Plan Review in-combination with the North Devon and Torridge Local Plan.

Further work has been commissioned to determine this impact; the Habitat Regulations Assessment and this SA will be updated to reflect the latest evidence before submission.

- 2.29 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.
- 2.30 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***

- 2.31 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 CO<sup>2</sup> 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).
- 2.32 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 affected 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.
- 2.33 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 around 6% (2013) to around 4% in 2015/16, before recovering to around 8% by 2018/19 (Statutory Security of Supply Report, 2013). 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. The region is rich in renewable energy resources and Devon has the highest installed renewable energy capacity of any county in the South West.

2.34 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.

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. As the Local Plan Review has progressed, Central Government have consulted on a ‘Housing Standards Review’ (2013) which set out the range of standards to be considered. Since this consultation, Government have produced a nationally described Space Standard which has been incorporated into Mid Devon’s Local Plan Review, under Policy DM13: Dwelling sizes.

### ***Population and housing***

2.35 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.

2.36 The average household size in Mid Devon is marginally smaller at 2.35 persons than the England average of 2.36 persons. The median age of the population in Mid Devon rose from 41 in 2001 to 44 in 2011. In comparison the median age in England and Wales climbed from 37 to 39 over the same period. Whilst overcrowding has risen slightly to 4.4% from 4% between 2001 and 2011 it remains well below the figure for England and Wales of 8.5%. The 2011 Census also showed that 20.3% of households include a member with a disability.

2.37 The Council has commissioned a new Strategic Housing Market Assessment (SHMA) 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.

### ***Community and wellbeing***

2.38 The health of people in Mid Devon is generally better than the England average. Deprivation is lower than average, however about 12.5% children live in poverty. Life expectancy for both men and women is higher than the England average (Mid Devon Health Profile, 2014).

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.

### ***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 74.8% of Mid Devon employment (Economic Trends Report, August 2014).

2.41 Overall the net commuter flows of Mid Devon District show that more people commute out of Mid Devon than those that in commute with a strong 'pull' from neighbouring urban areas, especially Exeter. 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.

2.42 The Council commissioned an Employment Land Review in 2013, to assess the scale and nature of demand for employment land and premises in the District. The report concludes that the evidence suggests that the Council should consider rationalising its employment land supply through review of planning policies. It recommends that the Council plan for 30-40 hectares of employment land over a twenty year period, equating to approximately 140,000 square metres floorspace.

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. 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 is presented in the Tourism Study (2014). The Tourism Study identifies a number of areas where opportunities exist to encourage tourism in the District and proposes a multi-pronged approach focussing on: marketing market towns and surrounding areas; developing the accommodation offer; maximising the natural offer; catching passing tourists and creating fun activities for children to attract family trips.

### ***Historic environment***

- 2.44 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 an additional 16 of local value. The area also has 51 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.
- 2.45 The three 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. However, whilst the heritage of the district is critical to local character, there is no comprehensive coverage of documents that provide an aide to protection. Of the 51 conservation areas, only 13 have conservation area appraisals (CAAs) and five have conservation management plans. Whilst the three 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 conservation areas adopted in 2003 and one new conservation area and associated appraisal and management plan adopted in 2014, as well as a total of five revisions to boundaries in the last 10 years. 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. The Heritage at Risk Register (2014) identifies 24 Heritage assets at risk within Mid Devon District. These range from conservation areas to Listed Buildings and Scheduled Ancient Monuments.
- 2.46 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.

## **Resources**

- 2.47 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.
- 2.48 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.
- 2.49 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.
- 2.50 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 34% of new or converted housing and 69% of new employment development in 2012/13. 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.
- 2.51 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:

<b>Grade</b>	<b>Percentage land coverage</b>
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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)

Individual sites were surveyed in more detail using the revised 1988 guidelines between 1989 and 1999. In Mid Devon these areas fell in the following settlements, Tiverton, Cullompton, Crediton, Burlescombe, Copplestone and Willand. The latest agricultural advice is used to assess sites where available, however a full resurvey has not been undertaken on a district-wide basis since it was originally commissioned. It is unlikely to have changed significantly despite the growth in urban areas. The best and most versatile land is defined as grade 1, 2 and 3a in the NPPF and it is noted that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local authorities should seek to use areas of poorer quality land in preference to higher quality.

### **Minerals**

2.52 Devon is also a county with valuable mineral resources. The county for example, along with Dorset and Cornwall, is the only source in the UK of ball and china clay. Responsibility for minerals planning is a function of Devon County Council. 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.

### **Rural areas**

2.53 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.

2.54 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.

2.55 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 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***

- 2.56 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. 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.
- 1.3 High levels of car ownership and hotspots of poor local road infrastructure have impacted on local air quality. Both Cullompton and Crediton were designated 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 was completed in 2014, however to date there has been no progress on new roads in Cullompton.
- 1.4 The M5 motorway through Mid Devon generally functions well but there are junction capacity issues at Junction 27 (J27) and Junction 28 (J28). Improvements are planned to both junctions but further works will be required to accommodate the level of growth proposed in the Local Plan Review. Mid Devon District Council will work closely with the Highways Agency (or any successor) to help ensure the continuing functionality of the M5. The Great Western mainline railway runs north-south through the district and has an hourly high speed train service between Bristol and Exeter, to and from London and an hourly cross country service to and from the midlands and the north.
- 1.5 Furthermore, the Tarka line, between Exeter and Barnstaple, provides hourly local services. There is an opportunity to open a station at Cullompton to serve Taunton and Exeter commuters. Key airports serving the area are Exeter and Bristol, offering scheduled flights to a number of domestic and European destinations as well as charter traffic.

### ***Waste***

- 2.57 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. Devon County Council has the duty as the waste planning authority and they are in the process of adopting the Devon Waste Plan 2014.

**Water**

1.6 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. The State of the Environment Report (2014) produced by the Devon Local Nature Partnership noted that the economic damage from flooding in Devon, Plymouth and Torbay currently costs £81m per year. This is estimated to rise to £1b per year in 2100 if no further protection measures are implemented.

2.58 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 (SuDs) and improved water efficiency within buildings. Government are currently consulting on changes to national policy on delivering SuDs. Subject to the outcome of this consultation, any changes to planning policy would come into force spring 2015. Proposals include applying a requirement that SuDs are provided to schemes of 10 or more homes, giving scope to decision-makers to give increased weight to the provision and maintenance of SuDs and rejecting applications that fail a policy requirement to normally deliver SuDs first over conventional drainage. A Strategic Flood Risk Assessment was commissioned in 2014 and considered the Local Plan Review and potential allocation sites. The conclusions from this assessment have been used in determining the strategic and site-specific options in the Local Plan Review to help steer new development to areas with the lowest probability of flooding.

**Sustainability issues**

2.59 The review of policies, plans and programmes including environmental protection objectives and the baseline information have been reviewed. Key sustainability issues have been identified and inform the sustainability objectives which form the basis of the framework to appraise the Local Plan Review strategy and policies.

<b>Key sustainability issues</b>	
<b>Natural Environment</b>	Biodiversity levels are continuing to fall, often dramatically for some species. There is potential for negative impact on the Water Framework Directive status of waterbodies across the district as a result of development.
<b>Built Environment</b>	Some heritage assets are at risk. Some 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.
<b>Climate Change and Flooding</b>	There is pressure for the installation of renewable energy developments to meet energy shortage however this may conflict with other objectives e.g. built environment. There is an

	increased risk of flooding as a result of climate change.
<b>Resource Use</b>	There are high levels of best and most versatile land across the district. There may be a conflict between protecting this resource and the need for development across the district. There are limited brownfield sites and therefore pressure to develop primarily on greenfield sites. There is also a need to avoid disposal of waste instead of prioritising re-use, recycling or reduction.
<b>Economic Growth</b>	There are higher levels of out-commuting than in-commuting, especially to Exeter and the potential loss of employment within Mid Devon. There is declining town centre health with town centre regeneration having the potential to be affected by any new out-of-centre development.
<b>Housing</b>	There has been a large population growth within the last decade and demographic household change leading to the need for new housing. Houses have not previously been constructed of a sufficient size to meet the needs of the modern family. There is a continued need for affordable housing.
<b>Community Health and Wellbeing</b>	Mid Devon has small areas of social deprivation within Tiverton, Cullompton and some of the remote rural areas (including high levels of child poverty). Access to services and facilities for rural communities has worsened and may continue to do so. There is a low retention of high-attaining school leavers. There are issues around traffic congestion and poor air quality within Crediton and Cullompton.
<b>Infrastructure</b>	There is a high dependency on the car across the district, with levels of car ownership having grown and continuing to grow. Rural self-employment or small business start-up is a growing sector, however this may be constrained by poor broadband speeds.

**The likely Evolution of the State of the Environment without Implementation of the Local Plan Review**

2.60 Consideration has been given to the likely evolution of the state of the environment in Mid Devon if the Local Plan Review was not implemented, as required by the SEA Directive Annex 1(b). The current Local Plan 2006-2026 effectively provides the ‘business as usual’ position. The assessment below therefore identifies what the situation would be like if the Local Plan Review was not prepared. Development proposals would still be considered through planning applications, guided by National planning policy and other legislation. Without the

development plan to take a strategic overview of development needs and opportunities for enhancement taking the strategic plan for development up to 2033, proposals later in the plan period (post 2020) would be considered on an ad hoc basis. This would result in uncertainty over the likely levels of growth in the future (and its location) beyond that which already has planning permission.

Current Trend	Likely Evolution without the Local Plan Review
<b>Natural Environment</b>	
Changes in wildlife populations and habitat that 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.	Significant levels of growth are required to meet the projected population growth in Mid Devon. Without a strategic plan, the location and level of development would be on an ad hoc basis and may harm wildlife populations and habitats without appropriate mitigation.
<b>Built Environment</b>	
There are 51 Conservation Areas within Mid Devon; currently 13 have appraisals and five have management plans. The Heritage at Risk Register identifies 24 heritage assets at risk. There are potential conflicts between the protection of heritage assets and mitigating the impact of climate change, for example, through renewable energy features on listed buildings.	Developments would need to follow national policy which provides protection for designated heritage assets (such as Listed Buildings) and undesignated heritage assets (such as archaeological sites or locally listed assets). However, without the Local Plan Review, protection would not be afforded to potential heritage assets identified through planning applications until such time as they were added to the appropriate list. This may result in the destruction or removal of the asset before it has suitable protection, resulting in the loss of currently unknown heritage assets which are often irreplaceable.
<b>Climate Change and Flooding</b>	
The district has a long history of flood events, with the main source of flooding being from fluvial sources. There have also been various incidents of localised flooding including a canal breach along the Grand Western Canal during the winter of 2012.	Incidents of flooding are expected to increase as a result of climate change. The flood zones within the District may grow, resulting in fewer viable locations for development. Without the Local Plan Review, development proposals will be considered on an ad hoc basis and therefore the application of the sequential approach to direct development away from areas at highest risk would be limited. The necessary infrastructure would not have investment from development contributions leading to development in unsustainable locations.
<b>Resource Use</b>	
Mid Devon is made up of approximately 15% of grade 1 and 2, 65% grade 3 and 20% grade 4 and 5 agricultural land.	The projected population growth up to 2033 requires development beyond that which is allocated in the existing Local Plan. Without this strategic plan consideration of options for development would be limited with proposals considered on an ad hoc basis. This would limit the opportunities to use areas of poorer quality

	land in preference to higher quality. Higher levels of development may be located in areas of the best and most versatile land.
<b>Economic Growth</b>	
There are low levels of in commuting and strong 'pull' from neighbouring urban areas. The existing Local Plan provides for 300,000 square metres of employment and 10,000 square metres of retail floorspace. Evidence from the Employment Land Review (2013) suggests that employment land supply should be rationalised.	National policy states that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. In view of the shift of policy emphasis in the NPPF there is a need to rationalise the scope of employment land allocations in the District to rebalance the employment land portfolio. Without the Local Plan Review evidence suggests that it is unlikely that the market will support the delivery of all the employment land allocations made in the current Local Plan in addition to current commitments.
<b>Housing</b>	
Census data reveals that the rate of population growth in Mid Devon from 2001-2011 has risen faster than the rest of Devon, the South West and England. Existing plans allocate sufficient land to meet strategic targets up to the year 2026.	Without the Local Plan Review (which plans for development up to 2033) development would remain in sites which are allocated and through windfall, until the five year land supply cannot be demonstrated. At that point, development would occur on an ad hoc basis. This may lead to development in unsustainable and unsuitable locations.
House prices in Mid Devon are above the averages for Devon and affordability remains a critical issue.	Without the Local Plan Review policy, support for affordable housing will become weaker later in the plan period which therefore would result in less affordable housing being provided as part of new development schemes.
<b>Community health and wellbeing</b>	
The health of people in Mid Devon in general is better than the England average. However the population profile is increasing in age and a priority for Mid Devon is addressing healthy weight in childhood. The Council's Green Infrastructure Plan recognises that access to public rights of way, playing fields and recreational open space is an essential aspect of public health and wellbeing.	Without implementing the nationally approved 'access standard' as part of the governments Housing Standard Review, opportunities to provide for accessible and convenient accommodation which is capable of adaptation would be limited. Care homes within the additional allocation policies would not be provided for and standards for public open space provision would not be sought. This may result in limited housing appropriate for older people and a lack of open space provision.
<b>Infrastructure</b>	
Mid Devon residents have a high dependency on private vehicles	High levels of car use will increase levels of air pollution and noise disturbance. The necessary infrastructure would not have investment from development contributions, leading to increased congestion on Mid Devon's road network.

### 3 Sustainability Appraisal Methodology

#### Developing the plan and options

- 3.1 This is the third 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 second consultation undertaken during February and March 2014 (Options Consultation) set 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 were also been included. A scoping and interim SA accompanied the two previous consultations on the Local Plan Review which provided an assessment of the sustainability impacts of the scope of the plan and policy options.

#### ***Local Plan Review: Scoping Report***

- 3.2 Natural England and the Environment Agency made a number of recommendations about the content of the Scoping Report. These have been incorporated into 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 Review. 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

#### ***Local Plan Review: Options Consultation***

- 3.3 The Local Plan Review: Options Consultation report contained a range of strategic policy options and sites. It contained more sites than the Council needed to allocate. Some of the sites were listed as preferred sites. These were stated as preferred as they are already allocated in the current Local Plan, 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. The sustainability of these sites was also previously subject to a SA alongside the preparation of the AIDPD document. Though stated as preferred in this second consultation, they were still subject to ongoing SA and consultation as part of the process of preparing the Local Plan Review.

3.4 During the Options Consultation the Council received a number of comments from consultees regarding the Interim SA. In July 2014 the Council consulted Natural England on a draft (June 2014) of the Proposed Submission Plan for comment. Comments from the Options Consultation and statutory consultees have been incorporated into this SA of the Local Plan Review. In summary, their responses stated the following:

- There were some anomalies in the number of dwellings identified in the SA and the Local Plan Review: Options Consultation Report.
- It was felt that there were some inconsistencies in how similar sites were appraised and their subsequent scoring.
- Geodiversity should also be considered.
- Colour coding would help illustrate more clearly where negative and positive effects are likely to occur.
- A non-technical summary was requested and clarity should be improved.
- New evidence where available should be considered on previously allocated sites.
- Consideration of the best and most versatile agricultural land should be provided for in the assessment.
- The commercial element of the potential J27 allocation should be assessed independently to the residential element.
- The rationale for some scores should be clarified.

3.5 The Local Plan Review sets out the preferred strategic policies for the District until the year 2033 including the future strategy for development, identifies sites for housing, employment, infrastructure, environmental protection and provides an updated set of development management policies. The preferred strategy and policies have been developed iteratively over the course of the Plan, reflecting community engagement, the SA process and the supporting evidence base.

#### **Sustainability Appraisal framework objectives**

3.6 A framework is used to understand the sustainability effects of the Local Plan Review as has been developed, consisting of sustainability objectives, each of which include a number of elements against which a policy will be appraised. The framework includes all those factors highlighted within the SA that will affect the sustainability of the Local Plan Review and is central to the process of SA.

3.7 The framework below represents a more simplified approach than that used in previous Mid Devon SAs to offer greater flexibility as the Local Plan Review contains both high level strategic policies, site allocations and detailed policies to guide development management decisions. It has also been amended to reflect comments received during the Options Consultation. This new framework can be applied to all these policies equally.

<b>Sustainability objective</b>	<b>Elements covered</b>	<b>Impact</b>
A) Protection of the natural environment	Habitats and biodiversity; flora and fauna; protected species; landscape, geodiversity	
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 wellbeing	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 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	

3.8 The sustainability objectives proposed are distinct from the objectives of the Local Plan Review, though they may in some cases overlap with them. They will provide a way of checking whether the Local Plan Review objectives are the best possible ones for sustainability and will test the social, environmental and economic effects of the plan.

3.9 In order to consider the impact of the Local Plan Review against the sustainability objectives, a scoring system has been used. A score is provided against each of the objectives to highlight a policy or proposal's sustainability impacts. Collectively, this allows consideration of a policy's overall impact and enables comparison with other policies or proposals. It also enables the consideration of mitigation measures in which a secondary score has been provided if mitigation measures are provided for.

3.10 It is important to note that the scores should not be summed to produce a total score to determine the overall sustainability of a policy or proposal. Mathematical models can lead to an

‘artificial certainty’ in determining the effect of a policy or proposal where the impacts of issues can be subjective.

3.11 The use of a scoring system with a range from +3 to -3 highlights the scale of any potential impact. This system enables the opportunity to differentiate between marginal or significant impacts. 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

3.12 In some instances where there were technical deficiencies in which specific data was not available at the time of the SA assessments, an uncertain effect has been identified which is indicated by a question mark in the scoring box..

3.13 In addition to the scoring process, a commentary against each objective has been provided. This sets out a summary of the context of the policy/allocation and a description of the impact against each of the sustainability objectives. Measures for mitigation are also described and scores for post-mitigation are provided, whereby if mitigation measures are applied negative impacts may be reduced. This includes consideration of whether impacts noted are offset by other policies in the plan. Secondary, cumulative, synergistic, temporary, permanent, short, medium or long-term impacts are also reflected.

3.14 General guidance was followed when applying the scoring system to potential allocation sites; this is set out in Appendix 2. In some cases the scoring may differ from this guidance due to site specific context.

**The assessment of all policies and alternative sites, and general guidance to the scoring can be found in Appendix 2.**

## 4 Reasons for selecting / rejecting policy alternatives

- 4.1 This chapter summarises the reasons for selecting / rejecting the strategic, allocation and development management policy alternatives. The development of the Local Plan Review has been an on-going and iterative process with key pieces of evidence influencing the selection and rejection of options. Following each section a matrix is provided which sets out the scores of each preferred and alternative options. The full assessment of all policies and alternative sites, and general guidance to the scoring can be found in Appendix 2.

### Strategic Policies

#### **Policy S1 Sustainable Development Priorities**

- 4.2 Policy S1 sets out the sustainable development priorities to deliver the Local Plan Review's vision.

#### Alternatives

- 4.3 No alternative strategies exist as this policy reiterates locally the National Planning Policy Framework with the exception of Policy S1 a) development focus, which is discussed in more detail under the amount and distribution of development in Policy S2.

#### **Policy S2 Amount and Distribution of development**

##### ***Amount of residential development***

- 4.4 Policy S2 sets out the level of housing development required over the period 2013-2033. This position takes account of the latest SHMA (2015) which indicates the Districts objectively assessed need for Mid Devon as 7,200 dwellings, equating to 360 dwellings per year. The following table sets out the situation at 31<sup>st</sup> March 2014, indicating a remaining need for about 5,511 dwellings to be allocated.

Local Plan Review requirement	7,200
Completions since 2013	320
Commitments (dwellings under construction or with planning permission)	1,369
Uncommitted requirement	5,511

- 4.5 The SHMA 2015 will be completed before submission, the Local Plan Review will be updated to reflect the latest figures if any amendments take place.

#### Alternatives

- 4.6 The Local Plan Review: Options Consultation held in January 2014 consulted on the estimated requirement of 8,400 dwellings based on projecting forward the previous Core Strategy (2007) annual target and including a 20% buffer. This is a higher growth scenario than the SHMA 2015 has indicated in the latest report.
- 4.7 The SA notes that a higher growth scenario is likely to be more difficult to distribute between the towns while avoiding environmental impacts. The towns of Tiverton and Crediton are both reaching their landscape limits as they are contained in natural topographical bowls. Current development is at or just below these thresholds and significant future development may

exceed capacity under this scenario. In the case of Tiverton, only one strategic direction is available to the east and this option has landscape impacts.

- 4.8 In the case of Willand, growth is limited due to insufficient capacity of the existing motorway junction and the inability to fund a new junction with new strategic growth and motorway junction already committed at Cullompton. In Cullompton further growth beyond that which is proposed is limited by market capacity at least in the short/medium term.
- 4.9 The key purpose of this policy is to meet the housing needs of the district indicated in the latest SHMA 2015 The alternative policy option exceeds the housing needs target of 7,200 by setting a target of 8,400 dwellings and therefore is not a preferred strategy.

<b>Amount of Residential Development</b>		
<b>Sustainability objective</b>	<b>Preferred Meet housing need Scenario (7,200 dwg)</b>	<b>Alternative Higher Growth Scenario (8,400 dwg)</b>
A) Protection of the natural environment	0	-1
B) Protection and promotion of a quality built and historic environment	0	0
C) Mitigating the effects of climate change	0	0
D) Safeguarding and minimising resource use	-2	-3
E) Promoting economic growth and employment	+1	+1
F) Supporting retail	+1	+1
G) Meeting housing needs	+3	+3
H) Ensuring community health and wellbeing	+1	+1
I) Delivering the necessary infrastructure	0	-2

#### ***Amount of commercial development***

- 4.10 Policy S2 sets out the levels of commercial development required over the period 2013-2033 at 154,000 square meters. This target takes account of the Employment Land Review 2013 (ELR) and the Retail Study 2012 that both provide technical advice on the levels of need and demand for development in Mid Devon.
- 4.11 The ELR recommends the Council plan for 30-40 hectares of employment land, which is considered equivalent to approximately 140,000 square metres floorspace. The Retail Study identifies a limited need for non-food retail at around 14,000 square metres up to 2026. To provide flexibility of provision and allow for growth, the Local Plan Review has rationalised the scope of employment land allocations in the District and allocates 134,420 square metres commercial floorspace on top of existing commitments of over 100,000 square metres. This approach is set out in Policies S2 & S6 and follows the recommendations of the ELR. The Scoping Report consultation identified significant support for the option to reduce employment growth.

#### ***Alternatives***

- 4.12 The Core Strategy attempted to address the long-standing situation where a high proportion of Mid Devon residents commute to work outside the district. Employment floorspace targets and land allocations sought to address the balance by a creating a 1:1 ratio of jobs to working

population. The existing Policy COR4 sets out a need for approximately 300,000 square metres of employment (B1-B8) floorspace and 10,000 square metres of retail (A1) sales. The ELR concluded that the market is unlikely to support the delivery of the current employment land allocations. National policy also states that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. In view of the shift of policy emphasis in national policy and the revised evidence the over-allocation of employment floorspace is not a preferred option.

<b>Amount of Commercial Development</b>		
<b>Sustainability objective</b>	<b>Preferred Meet commercial need Scenario (154,000sq m)</b>	<b>Alternative Higher Growth Scenario (310,000sq m)</b>
A) Protection of the natural environment	0	-1
B) Protection and promotion of a quality built and historic environment	0	0
C) Mitigating the effects of climate change	0	-1
D) Safeguarding and minimising resource use	-1	-3
E) Promoting economic growth and employment	+3	+3
F) Supporting retail	+3	+2
G) Meeting housing needs	0	0
H) Ensuring community health and wellbeing	+2	0
I) Delivering the necessary infrastructure	0	-2

### ***Distribution of development***

4.13 The Local Plan Review seeks to concentrate development at Tiverton, Cullompton and Crediton, to a scale and mix appropriate to their individual infrastructures, economies, characters and constraints. Other settlements will have more limited development which meets local needs and promotes vibrant rural communities. Development targets are as follows:

Location	Residential (dwellings)	Commercial (square metres)
Tiverton	2,160 (30%)	38,000
Cullompton	3,600 (50%)	77,000
Crediton	720 (10%)	15,400
Rural areas	720 (10%)	30,800
<b>Total</b>	<b>7,200 (100%)</b>	<b>154,000</b>

4.14 Central to Policy S2 is the role of Cullompton in meeting the district's long-term development needs. The largest allocation in the Local Plan Review is East Cullompton (Policies CU7-CU12), which will have access onto the M5 motorway and deliver significant improvements to highways infrastructure for the whole town. The concurrent development of the North West Cullompton Urban Extension will see a new road linking Tiverton Road to Willand Road, which will relieve traffic congestion in the town centre, improving local air quality and the living conditions of residents. This is a departure from the historic planning strategy which focused the majority of development in Tiverton, commensurate with the size and sub-regional role of the town.

- 4.15 The land east of Cullompton preferred by the Local Plan Review is relatively unconstrained in landscape and environmental terms and forms a natural extension to one of Mid Devon's most sustainable settlements. Cullompton has excellent connections to the M5 motorway and the economic benefits this brings in particular with storage and distribution uses. Technical constraints to development in this location centre on the traffic capacity of the existing M5 J28. Devon County Council transport assessment confirms that existing junction capacity can't be improved and that a new slip road is required to relieve pressure. The transport assessment considered a number of alternative solutions and concludes that a new junction is technically achievable. This takes into account the physical engineering and associated cost of constructing the transport interventions, and the potential human and environmental impacts of doing so. The expansion of Cullompton is both achievable and supported by the local community.
- 4.16 Tiverton will continue to expand through the development of the Tiverton Eastern Urban Extension (Tiverton EUE) and a number of smaller sites. The adopted Tiverton EUE Masterplan proposes up to 1,520 dwellings and at least 30,000 square metres commercial floorspace, with a new junction onto the A361, 47 hectares of strategic green infrastructure, a new primary school and a neighbourhood centre.
- 4.17 Crediton is the smallest of Mid Devon's market towns but serves a wider area in terms of employment, education and shopping. The physical constraints of Crediton limit the options for developable sites, and there are existing problems of traffic congestion through the town centre. Crediton is a designated air quality management area however the completed Crediton Link Road, which opened in October 2014, now provides a new direct route to the Lords Meadow Industrial Estate from the Wellparks roundabout on the A377, and also includes a shared cycleway and footway. The link road is seen as the primary mechanism for improving air quality in the town by redirecting traffic (in particular HGVs) from Exeter Road and thereby reducing traffic emissions. The housing target for Crediton only amounts to 10% of the district total due to the traffic and topographical constraints that exist.
- 4.18 Bampton has been re-classified as a village from a town to reflect the character, scale and constraints of the settlement (a review of the option to re-classify Bampton is discussed in the Villages section). Rural areas are expected to accommodate around 10% of the housing requirement for Mid Devon. The Local Plan Review generally allocates small sites, the development of which will help to support the vitality of rural areas without harming their character or putting undue pressure on local infrastructure. Commercial development in rural areas will come forward on non-allocated sites according to demand, enabled by supportive general policies. The Local Plan Review does however; retain small employment allocations in Bampton and Willand as these sites are already permitted or well-connected to existing commercial uses and infrastructure. The commercial site in Sampford Peverell is a mixed use site allocated for the development of a doctor's surgery and housing.

#### Alternatives

- 4.19 The Scoping Report in July 2013 considered three broad options, firstly retain the current strategy directing development towards the largest settlements, secondly to disperse development more widely, increasing the number of villages and allowing the larger villages to expand and thirdly a new settlement or significant expansion of an existing village to meet the districts entire need. Although the results of the public consultation favoured the first two

strategic approaches, the options consultation was strongly influenced by the availability of deliverable sites emerging from the Strategic Housing Land Availability Assessment (SHLAA).

- 4.20 The Options Consultation in January 2014 presented two strategic options, either to retain the town focus and concentrate development at Tiverton, Cullompton and Crediton or alternatively retain the same strategy up to 2026 but introduce a new community later in the plan period. For the second option two strategic locations for growth were considered, a commercial lead scheme at J27 adjacent Willand or the eastern expansion of Cullompton. No other alternative sites were available at the scale required to meet forecast demand in a single location.
- 4.21 The outcome of the public consultation showed a clear preference for option 2, a new community, 52% support in comparison to 33% support for option 1, the town centric approach. A town focused strategy of development would see continued development concentrated at Tiverton, Crediton and Cullompton following Mid Devon's historic pattern of growth. Of the new community options, development at east of Cullompton was favoured receiving 59% support in comparison to 24% support for J27 adjacent Willand. The SA of site specific options of East Cullompton and Land at M5 J27 Willand provides further analysis and comparison.
- 4.22 As well as considering public views, the preferred strategy must consider sustainability impacts and technical delivery. The SA of Policy S2 acknowledges advantages with a single new community including a scale of development that could support long term housing and commercial development for Mid Devon up to 2033 with the appropriate level of infrastructure and community facilities. With the effect on the natural environment and transport infrastructure an uncertain effect depending on the location of the site. A dispersed strategy was considered to be able to be more easily absorbed into the landscape and with potentially less impact on existing services, however there were limitations with this option due to the land availability in Crediton and Tiverton.
- 4.23 A straight forward comparison of individual sites through the town-centric strategic option is not considered practical through the SA given the number and combination of sites within each town. It is however considered implicit that should this approach be selected, strategic growth above and beyond the Tiverton EUE would be expected. Given Tiverton's topographical constraints only two directions of growth remain viable for development, firstly north of the A361 and secondly to the east along the valley. The Council has explored land availability to the north and has received confirmation that this is not available. To the east the only option is Hartnoll Farm, which is available and of significant scale to bring forward major housing and employment growth.
- 4.24 The SA of this site identifies a number of significant constraints. Development in this location would have a negative effect on the landscape character of Mid Devon; the site is bordered by the Grand Western Canal a County Wildlife site and Local Nature Reserve as well as a Conservation Area. There are significant coalescence concerns with the village of Halberton which has its own distinct identity. Beyond the site, transport study work by Devon County Council demonstrates concerns for traffic entering key junctions into central Tiverton and onto the A361 or out through the narrow roads of Halberton. Initial modelling suggests an additional relief road would be required through the Blundell's School site which itself has delivery issues.

4.25 At J27 land adjacent Willand, the SA assessed the residential and commercial elements separately as requested through the consultation process. For both elements the SA raised concerns around the potential for development to lead to a significant negative impact on the Culm Grasslands SAC due to increased traffic along the A361. This in combination with the scale of each element leading to potential negative impacts on the landscape and biodiversity led to a negative score of development at J27 on the environment. The SA also identified that residential development in this location would be situated in the open countryside, an unsustainable location some distance from existing facilities. Concerns were raised by duty to cooperate bodies on the commercial element of the site, in particular retail and the potential for this to negatively impact on town centre vitality and viability. The Tourism Study (2014) suggests that a major tourist facility would need to be supported by bespoke market research and any impacts on other parts of the district, particularly the market towns, and potentially on other adjoining areas be carefully considered. A commercially led tourism proposal in the same location was also assessed but was lacking sufficient information at the time of writing to fulfil the Council's requirements and the Duty to Cooperate. Furthermore the location of the commercial development could constrain future working of the remaining permitted mineral reserves within Hillhead Quarry. Again, Devon County Council has considered traffic and transport infrastructure at J27 which would also experience capacity issues without appropriate mitigation. In considering the range of potential significant issues with either the commercial or residential elements of development at J27, development at this site would not be preferred. The separate assessments of the commercial and residential elements of J27 are reflected in the villages section of the matrices and Appendix 2.

<b><i>Distribution of Development (using preferred option of 7,200 dwellings)</i></b>			
<b>Sustainability objective</b>	<b>Preferred New Community (J28 Cullompton)</b>	<b>Alternative Town Focus (Hartnoll Farm)</b>	<b>Alternative New Community (J27 Willand)</b>
A) Protection of the natural environment	-1	-1	-2/?
B) Protection and promotion of a quality built and historic environment	0/?	-2/?	0/?
C) Mitigating the effects of climate change	0/?	0/?	0/?
D) Safeguarding and minimising resource use	-3	-3	-3/?
E) Promoting economic growth and employment	+3	+2	+3
F) Supporting retail	+1/?	+2	-3/?
G) Meeting housing needs	+3	+3	+3
H) Ensuring community health and wellbeing	0	+1	0
I) Delivering the necessary infrastructure	+2	+2	+2/?

**Policy S3: Meeting housing needs and Policy S4: Ensuring housing delivery**

4.26 There is a continued need for affordable housing in Mid Devon which has been demonstrated by various reports. The SHMA concluded that 96 units of affordable housing are needed per year to meet existing “backlog” need and future needs arising in the district. This is equivalent to about 27% of the total housing need for Mid Devon. This is reflected in the affordable housing policy which requires development to meet this need by providing a proportion of

dwelling as affordable on sites above the threshold. The application of the affordable housing policy is anticipated to deliver just over 2,000 affordable dwellings across the plan period, equating to approximately 28% of total housing supply. However it is recognised that the level of supply is unlikely to meet the anticipated need as not all allocations will come forward or others may be developed with a lower housing number than specified in the policy. Furthermore, the Council has to consider the implications of meeting the need on the viability of new housing development.

4.27 Viability assessment work undertaken for the Council in relation to the Community Infrastructure Levy (CIL) has established that with a target of 30% affordable housing in rural areas and a 25% target in the towns a CIL charge of £60 per sq m is viable. Balancing the provision of affordable housing with infrastructure is essential to achieve sustainable development over the plan period to 2033.

4.28 Policy S3(b) gives open market housing sites of 11 dwellings or more in Tiverton, Cullompton and Crediton a target of 28% affordable dwellings, and on sites elsewhere of 6 dwellings or more a target of 30% affordable dwellings. The Local Plan Review supporting viability study tested multiple alternative scenarios and concluded that this option was viable without undermining infrastructure provision through CIL. The Options Plan consulted on the Adopted policy position set out in the AIDPD AL/DE/3 with the exception of Bampton which has been reclassified as a village.

4.29 Local evidence suggests that there is a demand for self-build housing in Mid Devon in that approximately 2,000 people search online for self-build plots every year in Mid Devon and the Council's Citizen Panel Survey (2013) shows that 12% of respondents were considering building their own home. To support self-build housing on sites of 20 dwellings or more, Policy S3(d) requires developers to make available for purchase at least 5% of serviced dwelling plots for sale to self-builders for a period of 12 months per plot and any plots subsequently developed for self-build must be completed within 3 years of purchase by a self-builder. As a new Government lead delivery mechanism, there is a degree of uncertainty in determining the level of interest in this proposal, a flexible approach has therefore been applied.

4.30 Policy S3(e) states that a five year supply of gypsy and traveller pitches will be allocated on deliverable sites within Mid Devon, this approach reflects the NPPF position locally.

4.31 If housing delivery falls below the action level set out in Policy S4 or a five year supply cannot be demonstrated, this will be addressed through proactive development management to bring forward allocated and permitted sites, and then through the release of deliverable contingency sites. This policy supports the NPPF which requires local planning authorities to ensure that there is a supply of specific deliverable housing sites with a capacity equivalent to 105% or five years' worth of the annual housing target by releasing contingency sites. Alternative contingency sites were considered through the SA of individual sites.

#### Alternatives

4.32 To ensure development which is both viable and sustainable, no reasonable alternative strategies have been identified.

#### **Policy S5: Public open space**

4.33 Access to public open space including sports facilities is an essential element of healthy communities and national policy promotes such provision. To this end the Council has undertaken an Open Space and Play Area Study (2014) to identify the level of supply across Mid Devon and the gaps in open space provision. The results of the study are presented in Policy S5 which aims to maintain the current levels of provision per person as Mid Devon's population increases and to increase the provision of teenage facilities.

Alternatives

4.34 The preferred option builds on the policy presented in the Options Consultation which used 'Fields in Trust' six acre standard in proxy for the draft Open Space and Play Area Strategy. No reasonable alternative strategy has been identified.

**Policy S6: Employment**

4.35 The provision for employment needs of community in this policy reflects the amount of commercial floorspace identified in Policy S2: Amount and Distribution of Development and sets out the range of employment-generating uses considered.

Alternatives

4.36 Given the reasons set out in the assessment of Policy S2: Amount and Distribution of Development for reduced employment growth and the arguments against the over-supply of employment floorspace no reasonable alternative strategies are considered.

**Policy S7: Town Centres**

4.37 Policy S7 seeks to secure the sustainability of Mid Devon's market towns by focusing development within town centres. The Retail Study suggests that a changing role or focus for town centres may be required, involving conversion and redevelopment to other uses. To this end, the Local Plan Review incorporates tourism and leisure uses within the retail part of the commercial development target in Policy S2 and has a positive strategy for the enhancement and regeneration of town centres.

Alternatives

4.38 No reasonable alternatives are considered as this policy promotes sustainable development in town centres. The Policy was updated from COR6 to exclude Bampton reflecting its change in its status to a village. The re-classification of Bampton as a village is discussed under Policy S13: Villages.

**Policy S8: Infrastructure**

4.39 Policy S8 ensures that new development is served by appropriate infrastructure.

Alternatives

4.40 No reasonable alternative strategy has been identified.

**Policy S9: Environment**

4.41 Policy S9 supports development that will sustain the distinctive quality, character and diversity of Mid Devon's environmental assets and minimise the impact of development on climate change.

### Alternatives

4.42 No alternative strategies exist as these policies reiterate locally the National Planning Policy Framework.

### **Policy S10: Tiverton**

4.43 Tiverton will continue to develop in a balanced way as a medium sized market town serving a rural hinterland in the eastern part of Mid Devon. The overall development targets for Tiverton are set out in Policy S2. The policy lists local objectives. The figures set out in this policy reflect a number of smaller sites allocated around the town. This strategy was supported in the Scoping Report Consultation (July 2013).

### Alternatives

4.44 To accommodate additional housing need, this would require further expansion to the east 'Hartnoll Farm'. Given the reasons set out in set out in the assessment of Policy S2: Amount and Distribution of Development for the preference of the East Cullompton site and the issues around the Hartnoll Farm site no alternative strategies are considered.

### **Policy S11: Cullompton**

4.45 Cullompton will develop as a fast growing market town with a strategic role in the hierarchy of settlements in Mid Devon. The town will become the strategic focus of new development reflecting its accessibility, economic potential and environmental capacity. The overall development targets for Cullompton are set out in Policy S2. The policy list local objectives, these have no alternatives. The option to pursue an alternative growth option in Cullompton was supported in consultation.

### Alternatives

4.46 Given the reasons set out in set out in the assessment of Policy S2: Amount and Distribution of Development for the preference of the East Cullompton site no alternative strategies are considered.

### **Policy S12: Crediton**

4.47 Crediton will continue to develop in its role as a small and vibrant market town, serving a rural hinterland in the western part of the district. The overall development targets for Crediton are set out in Policy S2. The target is a lesser amount than that which would meet the towns housing and commercial needs. This reduced figure reflects the numerous constraints facing the town, which include the need to avoid negatively impacting on the historic centre and adjoin historic parks and gardens whilst also acknowledging the challenging local topography and the potential for landscape impacts from development further into the hillside. The policy list local objectives, these have no alternatives.

### Alternatives

4.48 The district-wide strategic option of providing a new community at J27 or J28 of the M5 would result in the same housing target for Crediton as Option 1. Meeting the housing and commercial needs of Crediton was not considered reasonable given the constraints facing the town and the available sites in Crediton.

### **Policy S13: Villages**

4.49 There are a number of settlements which do not function as market towns, but which provide a limited level of services which support vibrant rural communities. These are locations which are suitable for a limited level of development meeting local needs appropriate to their individual opportunities. The 22 settlements set out in the policy are considered to be appropriate for a limited level of development, based on their physical characteristics, and the availability of the following three essential services identified: educational facility, convenience store and transport service. The recent national trend in the loss of rural services has meant that if more essential services were required, for the category, very few villages would now qualify as a village and the essential services were agreed as appropriate from a transport perspective by Devon County Council. Yeoford does not have a shop but is considered appropriate for inclusion in Policy S13 due to its accessibility to other settlements and the availability of public transport including a daily train service. The *Living Working Countryside: The Taylor Review of Rural Economy and Affordable Housing* (2008) supports development in rural areas which makes living in the countryside more sustainable. As there are a number of developments which come forward in rural areas within settlement limits, having small allocations in villages for development will ensure the vitality of rural areas without harming their character or putting undue pressure on infrastructure.

### **Alternatives**

4.50 The option to have limited to zero development in the villages and spread development between the market towns was not considered a reasonable alternative. The previous strategy for development pursued a very strong town-centric strategy, but since 2006 the average housing completions outside the towns have been twice the level anticipated, leading to the need for allocation sites within villages to be included in the Local Plan Review.

4.51 The Options Consultation considered two alternative options; either have a higher 1,600 residential dwellings in rural areas or a lower 1,040 residential dwelling numbers. The first option was in association with the town centred option and the second with the new community approach. As these options are considered under the ***Distribution of development*** section, no alternative strategies for villages are considered as these are incorporated in the alternatives for S2: Amount and distribution of development.

### ***Bampton***

4.52 In response to the Scoping Report consultation and taking into account the written responses received, Bampton has been re-classified to match the designated villages in Mid Devon. This approach ensures that development will still be provided in Bampton but at a level appropriate to its individual opportunities.

### **Alternatives**

4.53 Previously Bampton was classified as a town, however upon analysis, Bampton met the essential criteria identified in Policy S13 and has similar characteristics to other settlements identified as villages in this plan, including a similar parish population size. In comparison to the three market towns within the district, the population of Bampton parish is more than four

times smaller than Crediton, the smallest of the market towns identified in this plan. Although Bampton provides important services to the surrounding community it does not have the same significant strategic role of the three market towns within the district (Tiverton, Cullompton and Crediton), which provide a range of services, retail and employment to the surrounding community and are well connected to the Strategic Road Network. Bampton is not located near the Strategic Road Network and the nature of the road within Bampton itself limits the level of traffic that can be supported through the settlement. Bampton also has some topographical and flood risk constraints which restrict the level of development which can be accommodated within this settlement. Therefore the classification of Bampton as a town is not a preferred option.

**Policy S14: Countryside**

4.54 A strong rural economy is promoted by national policy through sustainable growth of business and enterprise in rural areas. Development in the countryside will be managed to meet local need, promote vibrant rural communities and help provide appropriate forms of agricultural and rural diversification to support the rural economy and sustain environmental qualities of the countryside. National policy advocates the provision of market housing in rural areas where it would facilitate the provision of significant affordable housing required to meet housing need. To facilitate the provision of affordable and low cost (discounted) housing in rural areas across Mid Devon, rural exception sites will be considered. New isolated homes will be avoided in the countryside unless there are special circumstances as set out in national policy and supplemented in relevant Local Plan Review policies such as Policy DM6: Rural exception sites, DM8: Rural workers' dwellings and DM9: Conversion of rural buildings.

**Alternatives**

4.55 No alternative strategies exist as these policies reiterate locally the National Planning Policy Framework.

Sustainability Objectives	Strategic Policies*																	
	S1: Sustainable development priorities	S3: Meeting housing needs	S4: Ensuring housing delivery	S5: Public Open Space	S6: Employment	S7: Town Centres	S8: Infrastructure	S9: Environment	S10: Tiverton	S11: Cullompton	Alternative Cullompton: Meet needs of community	Alternative Cullompton: Under provision	S12: Crediton	Alternative Crediton: Under provision	S13: Villages	Preferred: Bampton as a village	Alternative Bampton as a Town	S14: Countryside
A	+3	0	0	+2	0	0	-1	+3	+2	-1	0/?	0/?	-1	+2	+3	0	0	+3
B	+3	0	0	+2	0	+2	0	+3	+2	0	+1/?	+1/?	0	0	0	+1	+1	-2
C	+3	0	0	0	0	+2	+2	+2	+1	+1	+1/?	+1/?	-1	-1	+1	+2	+2	+2
D	+2	0	0	0	0	+2	0	+3	0	-2	0/?	0/?	0	0	0	-1	-2	+2
E	+3	0	0	0	+3	+2	+1	0	+3	+3	+3	+2	+3	-2	+3	+1	+1	+3
F	+3	0	0	0	+3	+3	+1	0	+3	+3	+3	+2	+2	+2	+3	+1	0	+3
G	+3	+3	+3	-1	+1	+2	+1	0	+3	+3	+3	+2	+3	+2	+3	+2	+2	0
H	+3	+1	+1	+3	+2	+1	+2	+1	+2	+2/?	+2	+1	0/?	0	+3	+1	+2	+1
I	+2	0	0	+2	0	+2	+3	0	+2	+2/?	+2/?	+2/?	+3	+3	+2	0	-1	+3

\*Separate matrices are provided for 'S2 Amount and Distribution of development' in the relevant section above.

## Site Allocations

4.56 The selection of site allocations at Tiverton, Cullompton, Crediton and the villages has been an iterative process principally steered by the scale and distribution of development set out in Policy S2: Amount and distribution of development, the availability of deliverable sites, public consultation and the SA process.

4.57 All of the sites consulted on in the Options Consultation were considered deliverable by the SHLAA panel and the Strategic Commercial Land Availability Assessment (SCLAA) panel and were assessed by the SA. Further sites put forward at the Options Consultation stage were taken to the relevant SHLAA or SCLAA panel. All new sites thought to be deliverable by the SHLAA or SCLAA panel have also been subject to detailed SA. Appendix 3 provides a list of sites considered undeliverable by the panels.

### Tiverton

4.58 Eight sites are allocated for housing in Tiverton, excluding two contingency sites at Tidcombe Hall and Wynnard's Mead that will be permitted to come forward if the Council's housing supply proves insufficient, as set out in Policy S4: Ensuring Housing Delivery. The eight sites are; Tiverton EUE , Farleigh Meadows, Town Hall/ St Andrews Street, Land at Moorhayes Park, Howden Court, Roundhill, Palmerston Park and Phoenix Lane.

4.59 The Tiverton EUE is the town's only strategic site which has an adopted Masterplan that proposes up to 1,520 dwellings and 30,000 square metres commercial floorspace, with a new junction onto the A361, a new primary school and community facilities. Policies TIV2-5 provide mitigation measures to address sustainability concerns.

4.60 Two sites in Tiverton are allocated to deliver employment up to 2033, through a range of uses: Tiverton EUE and Phoenix Lane.

4.61 Tidcombe Hall and Wynnards Mead have sustainability concerns hence their contingency status. Tidcombe Hall is reasonably well contained in the landscape but has a potential localised impact on landscape character, the setting of Tidcombe Hall and the Grand Western Canal. The site would also result in the loss of grade 1 agricultural land and would require improvements to Tidcombe Lane. The development of Wynnards Mead would impact on the house and the adjacent listed building as well as have potential visual impacts due to topography. Although an adequate site access is considered achievable, the existing carriageway and footway links to Tiverton are very steep and would require upgrading.

4.62 All sites have undergone a detailed SA against realistic alternatives and have had mitigation measures identified and included in their respective policy.

4.63 The Council's strategic infrastructure policy is set out earlier in the Local Plan Review under Policy S8, but there are infrastructure requirements specific to Tiverton that are listed under Policy TIV15.

### Alternatives

4.64 The Scoping Report consultation proposed two distinct options for Tiverton, firstly to continue with the current strategy expanding Tiverton to the east and allocating smaller sites around the town or identify a new location for long-term strategic growth (other than the east). The

second option was favoured in this initial public consultation. No long-term strategic sites around Tiverton were identified, apart from to the east, due to topographical issues to the south, west and north of the town, and flooding issues along the River Lowman and River Exe to the north, north east, north west and south west of the town. All SHLAA or SCLAA sites identified as deliverable (suitable, available and achievable) were included within the Options consultation. The Options Consultation identified seventeen potential housing sites within Tiverton some of which were already allocated in the existing Local Plan. A number were mixed use. Four sites were identified for deletion as they were either completed or under construction. Land at the Foundry was added later in the process as a result of the Options Consultation.

- 4.65 Hay Park has not been taken forward as development would result in the loss of historic barns (to ensure adequate access visibility displays) and has surface water flooding issues associated with the water course on site.
- 4.66 Although the Blundell's School site scores well in SA terms as a brownfield site in the heart of the town and could bring with it positive measures in delivering a link road, the Council's SHLAA panel believe delivery costs principally associated with access and flood mitigation measures would prohibit development in this location.
- 4.67 Leat Street has not been taken forward as it is an existing show room and as a residential allocation would result in the loss of employment land. A large portion of the site is located in flood zone 2 and even with mitigation measures there would remain flooding concerns.
- 4.68 The Avenue is a previously allocated brownfield site in central Tiverton. Although the site scores positively on sustainability grounds the site is not being comprehensively promoted by all land owners and has not received confirmation of delivery. The site is located within the settlement boundary and can come forward as a windfall allocation.
- 4.69 Exeter Hill is a steeply sloping site with large views of Tiverton and would be highly visible from the town. Although the level of development is relatively low, development of the site is still likely to result in a negative impact on the character of the landscape.
- 4.70 Land at Bampton Street / William Street Car Park has an estimated site capacity of 60 dwellings and 9,300 sqm of mixed commercial floor space. Although in sustainability terms site regeneration is a positive the SCLAA panel has raised delivery concerns.
- 4.71 Land at the Foundry has been proposed for commercial uses but is located in the flood plain. As it is within close proximity to the River Lowman and that the whole of the site has flooded in the past, there is a high possibility that the site is within the functional floodplain (Flood Zone 3b). There are also concerns over contaminated land which would need to be investigated and resolved.
- 4.72 Hartnoll Farm is considered a Strategic site option and has not been favoured as a preferred strategy through Policy S2. The inclusion of Hartnoll Farm in the Local Plan Review would extend Tiverton to the East substantially along the valley floor; significantly close the gap between urban areas and nearby villages, especially Halberton, and increase the distance from the town centre and services, resulting in increased car use and reduced sustainability. The majority of the site is classed as agricultural land grade I and development could impact on the

Grand Western Canal Conservation Area to the South and the East of the site which is also classed as a County Wildlife Site and Local Nature Reserve.

4.73 Below is a summary table of the housing and commercial sites assessed against the Sustainability Objectives. For information on the scoring, please see Appendix 2.

**Tiverton Housing and Commercial Sites**

Sustainability Objectives	Housing														Commercial							
	Preferred Sites (Housing)										Alternative Sites (Housing)				Pref.		Alternative					
	TIV1-5: Eastern Urban Extension (Mixed use)	TIV6: Farleigh Meadows	TIV7: Town Hall/St Andrews Street	TIV8: Moorhayes Park	TIV9: Howden Court	TIV10: Roundhill	TIV11: Palmerston Park	TIV12: Phoenix Lane (Mixed use)	TIV13: Tidcombe Hall (Contingency)	TIV14: Wynnards Mead (Contingency)	TIV15: Tiverton Infrastructure	Hartnoll Farm (Mixed use)	Blundell's School	Hay Park	The Avenue	Exeter Hill	Leat Street	TIV1-5: Eastern Urban Extension (Mixed use)	TIV12: Phoenix Lane (Mixed use)	Land at the Foundry	Hartnoll Farm (Mixed use)	Land at Bampton Street/William Street Car Park
A	-1	-1	+1	0	0	0	0	-1	-1	0	-1	+2	0	0	-2	0	0	-1	0	0	-1	0
B	-1/?	0	0	0/?	0	?	+1	-1/?	0	0	-2/?	0/?	-1/?	0	0/?	0/?	0	-1/?	+1	0/?	-2/?	0
C	+1	0	0	0/?	0	0	0	0/?	0	+2	0/?	-1	-1/?	0	0	0	-1	+1	0	-3/?	0/?	0
D	-3	-2	+2	-2	-1/?	+2	+2	-3	-1/?	0	-3	-1	-1/?	+2	-1/?	0	+2	-3	+2	+2	-3	+2
E	+3	+1	0	0	0	0	+2	+1	+1	0	+2	+2	0	0	0	-2	+3	+3	+2	+2	+2	+3
F	+2	+2	+1	+1	+1	+1	+3	+2	+1	0	+2	+2	+1	+1	+1	+1	+2	+2	+2	+1	+2	+3
G	+3	+3	+2	+1	+1	+1	+2	+3	+2	+2	+3	+2	+1	+1	+2	+1	+1	+3	+2	0	+3	+2
H	+2	+2	+1	+1	+1	+1	+2	0	+1	+3	+1	+1	-1	+1	0	+1	+2	+2	+2	0	+1	+2
I	+2	0	0	0	0	0	+1	0	0	+3	+2	+1	0	0	0	+1	+2	+2	0/?	+2	+2	0

## Cullompton

- 4.74 Six sites are allocated for housing in Cullompton, excluding one contingency site at Colebrook that will be permitted to come forward if the Council's housing supply proves insufficient, as set out in Policy S4. The six sites are; North West Cullompton, East Cullompton, Knowle Lane, Ware Park & Footlands, Land at Exeter Road and Cummings Nursery. Four sites are allocated for commercial use of which two are large scale mixed use sites at North West Cullompton and East Cullompton while the other two are Week Farm and Venn Farm.
- 4.75 North West Cullompton is retained as an existing strategic allocation. Initial work on the Masterplan has demonstrated only a reduced site capacity can be realised than that previously allocated in the Allocations and Infrastructure Development Plan Document (AIDPD) 2010, this is due to topographical constraints. With this reduction in mind the two adjacent options sites at Growen Farm to the west and Rull Lane to the north (a new site emerging from the Options Consultation) have been incorporated into the larger allocation site. These two additions ensure total site capacity remains approximately the same as previously allocated. The North West Cullompton sites now makes provision for 1,150 dwellings and 21,000sqm of commercial land, the site will include a road linking Tiverton Road and Willand Road.
- 4.76 A site of 160 hectares to the East of Cullompton is considered a long term location for strategic growth for the district. The site has an estimated capacity of 2,100 dwellings and 20,000 sqm commercial within the plan period and further residential development and 12,000 commercial floorspace post 2033. Development in Cullompton is severely constrained by the limited capacity at J28 of the M5 motorway, in addition to traffic congestion and poor air quality in the town centre. However this development, in combination with the urban extension to the North West of Cullompton, presents an opportunity to resolve town centre traffic problems through a Town Centre Relief Road, a 'through road' in the North West Cullompton site linking Tiverton Road and Willand Road and providing an alternative means of access onto the M5.
- 4.77 The site Cummings Nursery (previously known as East Culm Farm) has Planning Permission and is retained. The allocation at Knowle Lane is now nearing completion and a further site, Ware Park and Footlands, has been allocated which acts as small extensions in this location. Land at Exeter Road is retained as an existing allocation. Land at Colebrook is not required or preferred to other locations but a smaller site area than that proposed has been retained as a contingency. The reduced site area mitigates flood risk associated with the stream.
- 4.78 Week Farm commercial allocation is retained and supplemented by Venn Farm a sustainable location for a further 10,000 sqm of commercial floorspace. The mixed use strategic allocation at North West Cullompton and East Cullompton provides a combined amount of 41,000sqm of commercial floorspace within the plan period.
- 4.79 All sites have undergone a detailed SA against realistic alternatives and have had mitigation measures identified and included in their respective policy. Please see Appendix 2 for detailed analysis of the preferred and alternative sites assessed against the Sustainability Objectives.
- 4.80 The Council's strategic infrastructure policy is set out earlier in the Local Plan Review under Policy S8, but there are infrastructure requirements specific to Cullompton that are listed under Policy CU19 & CU20.

## Alternatives

- 4.81 Within the Scoping Report consultation, two options were proposed for consideration; to retain the current strategy with North West Cullompton Urban Extension as the primary site allocation and the Town Centre Relief Road, to pass through either the Cullompton Community Association fields to the west of the M5 or to pass to the east of the M5, or to find an alternative growth option such as a different location for an urban extension or multiple smaller sites around Cullompton, as highways infrastructure can be delivered. The second option was strongly supported by those responding to the consultation.
- 4.82 All SHLAA and SCLAA sites identified as deliverable (suitable, available and achievable) were included within the options consultation. The Options Consultation identified eleven potential housing sites within Cullompton some of which were already allocated in the existing Local Plan. A number were mixed use. Three sites were identified for deletion as they were not found suitable due to environmental constraints or are largely built-out. Eight sites were identified by the SCLAA as suitable for commercial development including a number of mixed use sites also considered for residential. Sites excluded through the SA process are discussed below.
- 4.83 Court Farm a previously allocated site is now largely built out with delivery concerns for the remaining site area. The site is located within the settlement limit and is suitable to come forward as a windfall site.
- 4.84 Acklands has recently been used as sport's pitches. National policy stipulates limited circumstances in which land for sport can be developed for alternative uses. The site is also classed as grade I agricultural land, the best and most versatile classification of land.
- 4.85 Tiverton Road is located to the west of Cullompton and would be an illogical extension in an isolated spur to the town. The site is also made of grade 1 high quality agricultural land, which covers only 3.5% of Mid Devon District.
- 4.86 Land at Bradninch Road steeply slopes and has a potential for visual impact as well as the loss of grade 3 agricultural land.
- 4.87 Part of the Commercial land at North West Kingsmill is located in flood zones 2 and 3 and it is isolated from the other parts of the industrial estate. The land adjacent Venndale and North East Kingsmills were less preferred than Venn Farm which is better related to the settlement form. The Week Farm allocation is retained. The North West Kingsmill and land adjacent to Vendale have been assessed together in Appendix 2 and the summary table below.
- 4.88 South of Springbourne can be viewed from the west and the east and has a high visual impact and there are also access concerns resulting in this commercial option not being preferred.
- 4.89 Below is a summary table of the preferred and alternative sites within Cullompton showing the scoring against the 9 sustainability objectives. For a more detailed assessment for each site, please see Appendix 2.

**Cullompton Housing and Commercial Sites**

Sustainability objective	Housing										Commercial										
	Preferred Sites					Alternative Sites					Preferred Sites			Alternative Sites							
	CU1-6: North West Cullompton (Mixed use)	CU7-12: East Cullompton (Mixed use)	CU13: Knowle Lane	CU14: Ware Park and Footlands	CU15: Land at Exeter Road	CU16: Cummings Nursery	CU19: Town Centre Relief Road	CU20: Cullompton Infrastructure	CU21: Land at Colebrook (Contingency)	Acklands	Tiverton Road	Court Farm	Bradinch Road	CU1-6: North West Cullompton (Mixed use)	CU7-12: East Cullompton (Mixed use)	CU17: Week Farm	CU18: Venn Farm	Land adj Venndale	NW Kingsmill Industrial Estate	NE Part of Kings Mill	Land South of Springbourne, East of Exeter Road
A	0	-1	0	0	0	0	-2	-2	0	0	0	-1	0	0	-1	0	0	0	0	0	-2
B	-1/?	0/?	0	0/?	0/?	+2/?	+1	+2	0/?	0/?	+2	0/?	0/?	-1/?	0/?	0/?	0/?	0/?	0/?	0/?	0
C	+1/?	0/?	0	0	0	+1	+2	+2	0	0	0	0	0	+1/?	0/?	0	0	0	0	0	0
D	-3	-3	-2	-2	-1	+2	+1	-2	-2	-2	+2	-1	-1	-3	-2	-1	-1	-1	-1	-1	-1
E	+3	+3	+1	0	0	+1	+2	+1	0	0	-1	0	+3	+3	+3	+3	+3	+3	+3	+2	+2
F	+2	+1/?	+2	+1	+1	+1	+2	+1	+1	+1	+1	+1	+2	+1/?	0	0	0	0	0	0	0
G	+3	+3	+3	+2	+2	+3	+2	+3	+2	+2	+2	+2	+2	+3	0	0	0	0	0	0	0
H	+2	0	+1	0	0	-1	+2	0	0	0	+1	0	0	0	-1	-1	-1	-1	-1	-1	-1
I	+2	+2	+1	0/?	0	0/?	+3	0/?	0/?	0	0	0	0	+2	0/?	0/?	0/?	0	0	0/?	0/?

## Crediton

- 4.90 Nine housing sites are allocated in Crediton, including Red Hill Cross and Wellparks which have planning permission. The other sites are; Cromwells Meadow, the Woods Group, Pedlerspool, Sports Field, Stonewall Lane, Land at Barn Park and land off Alexandra Close. Wellparks and Land south of A377 in Crediton are expected to deliver commercial floorspace during the plan period.
- 4.91 Wellparks will deliver 185 dwellings and 2,220 sqm of commercial land and is adjacent the new Crediton link road. Land at Pedlerspool previously a contingency site is allocated for 200 dwellings and the relocated Rugby Club which will free up the Sports Field for a further 120 dwellings. Stonewall Lane is in the northern part of Crediton and Red Hill Cross is an existing commitment, therefore it is included. Other small sites allocated will limit sustainability impacts including Cromwells Meadow, Land at Alexandra Close, the Woods Group and Land at Barn Park.
- 4.92 Land to the South of A377 formed part of an existing commercial allocation in an earlier Local Plan and is retained as a suitable commercial site.
- 4.93 All sites have undergone a detailed SA against realistic alternatives and have had mitigation measures identified and included in their respective policy. Please see Appendix 2 for the detailed analysis of sites against the 9 Sustainability Objectives.
- 4.94 The Council's strategic infrastructure policy is set out earlier in the Local Plan Review under Policy S8, but there are infrastructure requirements specific to Crediton that are listed under Policy CRE11.

## Alternatives

- 4.95 The Council has previously acknowledged that Crediton has significant topographical constraints and is therefore an unsuitable location for large scale allocations. The Scoping Report presented two options; to continue with the strategy for under-provision due to these physical constraints or to allocate sufficient sites to meet development needs. The consultation responses favoured the second option. All SHLAA or SCLAA sites identified as deliverable (suitable, available and achievable) were included within the options consultation. The Options Plan identified thirteen potential housing sites within Crediton some of which were already allocated in the existing Local Plan. Since the Options consultation, one site, George Hill, has been built out and has therefore been removed from the SA. Four sites were not preferred by the Council due mainly to environmental issues. Four commercial sites, including one mixed-use site came forward as commercial options for Crediton. Sites excluded through the SA process are discussed below.
- 4.96 Westwood Farm is located on the west side of the town, and any traffic generated by the site travelling to Tiverton, Exeter or the M5 would pass through the High Street rather than along the new Link Road, thereby potentially further exacerbating existing air quality issues.
- 4.97 Chapel Down Farm is not favoured as the northern portion of the site is grade 2 agricultural land and Chapel Downs Farmhouse is a listed building which sits adjacent to the site. Development of the surrounding agricultural land will further impact on the setting of the building, with the potential to reduce its significance.

- 4.98 Barnfield scores well in sustainability terms but subject to a suitable access being achieved. As a small brownfield site within the settlement limit, the site remains deliverable as a windfall site.
- 4.99 Fairpark House site is located within the conservation area and is in close proximity to a listed building. The site is a greenfield, with an agricultural land grade of 3 on a quarter of the site, the remaining part of the site has an unknown agricultural land grade.
- 4.100 Higher Road is located to the north of Higher Road on a greenfield site where there is currently little development. The site is relatively far from the town centre, but considered within walking distance. The site is bounded to the north by ancient woodland and scores well in sustainability terms but subject to suitable access being achieved.
- 4.101 South of Common Marsh Lane is not allocated as it is a greenfield site which falls within agricultural land grade 2. The site is also located adjacent to the existing industrial estate, increasing the industrial estate to the north where it would have landscape impacts.
- 4.102 Land East of Exeter Road is not favoured as the southern element of the site, comprising 3.4 hectares is agricultural grade 3. The elevated nature of the site means there is potential for development to have adverse landscape impacts as well as a negative impact on the historic setting of the adjacent buildings along Exeter Road. The site is also located adjacent to the existing industrial estate and in close proximity to the new link road.
- 4.103 Land at George Hill was under construction and has now been completed and has therefore been deleted. An SA for this site has not been included for this site.
- 4.104 Below is a summary table of the preferred and alternative sites within Crediton showing the scoring of the preferred and alternative sites against the 9 sustainability objectives. For a more detailed assessment for each site, please see Appendix 2.

**Crediton Housing and Commercial Sites**

Sustainability objective	Housing														Commercial				
	Preferred Sites											Alternative Sites			Pref.		Alt.		
	CRE1: Wellparks (Mixed use)	CRE2: Red Hill Cross	CRE3: Cromwells Meadow	CRE4: The Woods Group, Exeter Road	CRE5: Pederspool	CRE6: Sports Fields, Exhibition Road	CRE7: Stonewall Lane	CRE8: Land at Barn Park	CRE9: Land at Alexandra Close	CRE11: Crediton Infrastructure	Land at Westwood Farm	Land at Chapel Down Farm	Barnfield	Fairpark House	Higher Road	CRE1: Wellparks (Mixed use)	CRE10: Land south of A377	Land south of Commonmarsh Lane	Land east of Exeter Road
A	-1	0	0	0	-1	0	0	0	0	0	-1	0	0	0	-1	0	-1	-1	-1
B	0	0	0	+1	-1	0/?	0	0	0	0/?	-1/?	0/?	-1/?	0	0	0	-1/?	-1	-1
C	+1	0	0	0	0	0	+1	0	+2	0/?	0	0	+2	+2	+1	0/?	0	0	0
D	-2	-2	-1	+2	-2	-1	-1/?	-2	0	-1	-2	+1/?	-1/?	-1/?	-2	-1	-2	-2	-1/?
E	+2	+1	0	0	+1	0	0	0	0	0	+1	0	+1	+1	+2	+2	+2	+3	+3
F	+1	+1	+1	+1	+2	+1	+1	+1	0	+1	+2	+1	+1	+1	+1	0	0	0	0
G	+3	+3	+2	+1	+3	+2	+1	+1	+2	+2	+3	+1	+2	+1	+3	0	0	0	0
H	+1	0	0	0	+2	0	0	0	+3	-1	0	+1	0	0	+1	-1	-1	-1	-1
I	0	0	0	0	0	0/?	+1	0	+3	0	0	0	0	0	0	0	0	0	0

### **Village Allocations**

- 4.105 The development strategy for villages is set out in Policy S13. In total twenty-one housing sites are allocated in rural areas which are considered achievable. Most housing allocations in rural areas are expected to deliver around 20 dwellings per hectare due to the low density character of existing village development, but in some cases a higher or lower density is justified.
- 4.106 The Options Consultation identified sixty-nine potential housing sites in rural areas considered achievable in principle by the SHLAA panel with a total site capacity well above the anticipated rural requirement. Allocations in villages received a significant level of responses for and against individual sites during the Options Consultation. During this public consultation, thirteen additional sites have been proposed and considered through SA. This information has been used alongside the Sustainability Appraisal to determine final selection of preferred village allocation sites.
- 4.107 Site options promoted in un-designated villages (Policy S14: Countryside) have not been taken forward as they are located in unsustainable locations. These villages are as follows: Bickleigh, Burlescombe, Colebrooke, Oakford and Shillingford.

### **Bampton**

- 4.108 In Bampton three existing allocations are retained Newton Square, Scotts Quarry and Ashleigh Park. Newton Square is an existing allocation in a sustainable village centre location and Scotts Quarry and Ashleigh Park both have planning permission, but have not started construction hence their inclusion within the plan. Newton Square scores positively for safeguarding and minimising resource use as development would be located on brownfield land. The location of the development also provides the opportunity to make provision for the parking of delivery vehicles serving the convenience store at 4-6 Newton Square which helps support retail in Bampton.

### **Alternatives**

- 4.109 Bouchier Close and South Molton Road include areas of agricultural grade 3 land and therefore do not score as positively in safeguarding and minimising resource use as the preferred sites Newton Square and Scotts Quarry which include brownfield land and an opportunity to remediate contaminated land. Although Ashleigh Park has a similar agricultural land class as the alternatives, this site has planning permission and therefore its delivery is more certain and is preferred in comparison to the alternatives. South Molton Road has numerous protected trees on the site, which could be affected if the site was developed for housing. Land at Ball Hill is also adjacent to the sewage treatment works. If the site was developed the amenity of future residents may be negatively affected by odours associated with the works, which would be less likely to affect sites located at a further distance.

### **Bow**

- 4.110 In Bow the existing allocation of West of Godfrey Gardens is retained and land adjacent to Hollywell allocated. The West of Godfrey Gardens site now has planning permission, but was not under construction at the end of the most recent monitoring year. Land adjacent to Hollywell is a flat site which has the potential for only limited visual impact, in that it can be

accommodated within the pattern of built development, having existing buildings on its north, south and western boundaries.

#### Alternatives

- 4.111 Land adjacent Bow Mill Lane is more elevated than the adjacent West of Godfreys Gardens, having the potential for greater visual impact than the proposed allocations. The site of East Langford Farm would result in an unusual and illogical extension to the built environment. The site would project into the surrounding fields, resulting in a site with fields on each boundary but a poor relationship with the adjacent housing. Land adjacent Jackman car park is steeply sloping, and falls away sharply to the north. Developing the site would extend the built environment on the north side of the main road, which currently is generally arranged in a linear fashion, hugging the line of the A3072. Two commercial sites in Bow, South of Iter Cross and South West of Junction Road are existing allocations which are proposed for deletion. National and local policy towards rural employment development is now more permissive, and as a result these sites do not need to remain allocated in order to come forward.

#### Bradninch

- 4.112 In Bradninch only one option was promoted and this site has been allocated. Although the site scores a slight negative on the safeguarding and minimising resource use as it is located on grade 3 agricultural land, this is a small site which would provide local housing and contribute to affordable housing numbers in the district. The site has a good relationship with the existing built environment, being adjacent to existing housing to the north and west. The site is a logical extension to the built form, with the eastern boundary of the site following the line set by the furthest extent of the rear garden of the adjacent property.

#### Alternatives

- 4.113 No alternative sites were promoted in Bradninch.

#### Chawleigh

- 4.114 In Chawleigh the Barton has been allocated. This site is generally level and has an existing access provided as part of the adjacent School Close exception site development. The site has been reduced in size in comparison to the site promoted in the Options version of the Local Plan Review, in order to separate the site from the conservation area which lies to the east. In particular a row of trees, which lie within the conservation area and which line the route to buildings complex called 'The Barton', could have been detrimentally affected had the site area remained as originally proposed.

#### Alternatives

- 4.115 The alternative site of Tower Meadow has not been allocated. This site is located within the conservation area which could be negatively affected by developing in this location. A number of applications for development of this site have been refused in the past, with inspectors considering that the site currently makes an important contribution towards the character of the conservation area. On this basis the site is not proposed to be allocated.

#### Cheriton Bishop

4.116 In Cheriton Bishop a large area of land was promoted but only a small site at Land off Church Lane is allocated. This site has the benefit of linking the two parts of the village together, providing additional footpath across the site frontage. This improvement for example would reduce the need to walk in the road when heading towards the school from the southern part of the village.

#### Alternatives

4.117 A large amount of land was put forward for consideration within the village. The scale of the village naturally dictates that allocating much of this land would have been appropriate. However, in regards to each site, there are specific reasons why the other four options were not pursued. The Land near the church, is directly adjacent to the conservation area and wraps around the Grade II\* The Old Rectory, which could be negatively affected by developing in this location. Glebe is used as a playing area which is used by the local community and would need to be replaced if the site was to be developed. This can be avoided through the selection of other sites. Land adjacent to Woodleigh Hall and Land East of Hill View would extend the village in a linear fashion along the line of the former A30. Though this option is possible, alternative sites within the village are in closer proximity to local facilities (such as the school), thereby reducing walking times and potentially reliance on the private car.

#### Cheriton Fitzpaine

4.118 Four sites were put forward within the village. Two sites, Barnshill Close and Land adjacent primary school, have been proposed for allocation. Barnshill Close is a small infill site, with an existing access and is surrounded on three sites by modern built development. The impact of developing this site is considered to be very low. However, this is only a very small site, and as a result another site is proposed for allocation. Allocating Land adjacent to the new primary school provides the opportunity to ensure short walking distances to the school, as well as establishing a link between the main part of the village, and the nearby housing at White Cross. The allocation of these two sites also received generally wide support at the Options Consultation.

#### Alternatives

4.119 In Cheriton Fitzpaine a significant level of opposition was raised against the Glebe site in favour of other sites in the village. Responses from the Options Consultation highlighted the Glebe as being an area of green space of particular importance to the local community. It is also steeply sloping and has a portion of the site within Flood Zone 3. Landboat Farm, is also partially sloping and has an area within Flood Zone 3. Though the affected parts of the site could be excluded from housing development, the allocation of other sites in the village which are not in proximity to the floodplain reduces the likelihood of any negative impact on flood risk. Poole Barton is not preferred as it has the potential for a range of negative impacts. These include its partial location within the floodplain and conservation area (as well being adjacent to the Grade II\* Poole Barton farmhouse).

#### Copplestone

4.120 In Copplestone the Old abattoir site presents the opportunity to provide a car park to serve the railway station. The site also may contain contaminated land, which can be remediated as part of the redevelopment of the site.

### Alternatives

4.121 The alternative sites in the village received a significantly higher proportion of objection during the Options Consultation. Dulings Meadow and Bewsley Farm are relatively high grades of agricultural land, being grades 2 and 3 respectively. The Old Abattoir is nominally grade 3 agricultural land, but in reality is partially brownfield, having a number of buildings, now demolished, which were once contained within the eastern portion. Land off Bassetts Close is an existing allocation proposed for deletion. Land is not available to provide the required width of access off Bassetts Close, and therefore the site is not considered deliverable.

### Culmstock

4.122 In Culmstock the two existing housing allocations Linhay Close and Hunter's Hill are proposed to be retained. Linhay Close has been extended from the area currently allocated, but is a small site with the potential for limited visual impact. Hunter's Hill is also retained, being another small site adjacent to modern housing.

### Alternatives

4.123 The two sites of The Croft and Culmstock Glebe and Rackfields are not preferred. Both are within the elevated southern part of the village, with greater potential for landscape and visual impacts. This part of the village also contains the core of the conservation area, which is focused around All Saints Church. There is greater potential for impact on the conservation area should these sites be developed, which can be avoided by selecting others within the village. In addition, the Culmstock Glebe and Rackfields site received the greatest level of objection, of all the village's sites, during the Options Consultation.

### Halberton

4.124 In Halberton it is proposed to allocate the Land adjacent Fishers Way. This site was suggested as the preferred site of Halberton Parish Council, during the Options Consultation. It is adjacent to modern development and will have limited visual impact.

### Alternatives

4.125 Land at Blundells Road was not favoured by the Parish Council. The site is within the conservation area, with the potential for negative impacts, which can be avoided by allocating the other site within the village. Both sites would involve the loss of grade 1 agricultural land, the best quality agricultural land. However, the village is surrounded by only grades 1 and 2 land, and any allocation would involve some loss. No alternative sites of predominantly grade 2 land were put forward.

### Hemyock

4.126 Depot, a largely brownfield site within the village is preferred for allocation. This is an infill site, which has a history of untidy and informal uses, including planning permissions which have not been implemented. It is surrounded on all sites by existing modern residential development, and therefore the visual impact is likely to be minimal.

### Alternatives

4.127 In Hemyock four sites of Culmbridge Farm, Land north of Culmbridge Farm, Land adjacent Cemetery and SW of Conigar Close are not proposed for allocation. All are greenfield sites,

which would result in the loss of agricultural land (generally grade 3). Given the villages location within the Blackdown Hills AONB, consideration of the impact on the special qualities of the landscape designation is a factor. These four sites all have the potential for some landscape and visual impact. Allocating a smaller proportion of each site, and by use of sensitive design, some impact could be mitigated. However allocating the Depot site, being enclosed within the existing built surroundings of the village, reduces the likelihood of landscape or visual impact associated with other sites. In addition Brookridge Timber yard was promoted as a commercial allocation but was not preferred because of its isolated and unsustainable location, being some distance separated from the village. Policies regarding rural employment development are more permissive now than previously, so such a scheme does not necessarily need to be allocated in order to come forward.

### **Kentisbeare**

4.128 In Kentisbeare a single site was included within the Options Consultation, which received a number of objections during the Options Consultation. This site is an existing allocation which has not come forward since being allocated in 2010. Given that the site has been not progressed since being allocated, it is not proposed that it be retained in the new Local Plan Review.

### **Alternatives**

4.129 There are no alternative, deliverable sites to consider within the village.

### **Lapford**

4.130 A single site option was promoted at Lapford while during the consultation a further option emerged, however since the consultation both landowners have withdrawn their land. As a result no sites are available to be allocated within the village.

### **Alternatives**

4.131 There are no alternative sites to consider.

### **Morchard Bishop**

4.132 In Morchard Bishop three sites have been promoted with preference given to retaining an existing allocation, but with an increased site size. This site is adjacent to modern housing and was clearly the favoured local choice during the Options Consultation.

### **Alternatives**

4.133 Church Street is not preferred as it has the potential for negatively impacting on the conservation area and adjoining listed buildings. This site received the greatest level of objection during the consultation. Tatepath Farm is separated from the main body of the village, being located a distance along a relatively narrow lane. Not being adjacent to existing development, there is the possibility for visual impact as a result of locating residential development in this location, instead of the existing farm buildings, which arguably form part of the rural character, particularly when viewing from the north.

### **Newton St Cyres**

4.134 In Newton St Cyres, three site options were considered. All three sites are unfortunately located on grade 2 agricultural land. Court Orchard, however, is the preferred site as this option has been put forward on the basis that it can also deliver a new school, allowing the school to be moved to a more suitable location, away from the busy A377. A portion of the site is within Flood Zones 2 and 3, however, the policy sets restrictions on which uses are acceptable within these areas.

#### Alternatives

4.135 The two sites east and west of Tytheing Close are not proposed for allocation. These sites are more visually prominent, being located on higher ground on the east side of the village. The proposed site also facilitates the relocation of the school, which was not an option put forward by the promoters of the other two sites.

#### Sampford Peverell

4.136 In Sampford Peverell four large sites were promoted through the Options Consultation and two more submitted subsequently, with the potential for a very high number of dwellings, being far in excess of what is likely to be appropriate for a designated village. The former Tiverton Parkway Hotel site is proposed for allocation. This is a modest sized, brownfield site which has lain derelict for a number of years since the previous hotel was demolished. The site is untidy, and though two planning permissions have been granted within the last seven years for a care facility, the site owners have stated they no longer are able to pursue this option. The planning permissions included provision for a new GP surgery. In order to ensure the delivery of this important local facility, it is proposed to the site for a mixed use including housing.

#### Alternatives

4.137 All the alternative sites within the village would involve the loss of greenfield land, which is either agricultural grades 2 or 3. Higher Town is elevated and therefore has the potential for greater landscape or visual impacts. Land off Whitnage Road (including the additional land put forward at Mount Pleasant) is located adjacent to the A361, sharing a long boundary with this busy road. Such a site therefore has greater potential for negative impacts from noise on the general amenity of future residents, which can be avoided by allocating alternative sites. Morrells Farm adjacent the main road (SHLAA site 3 & 4 combined) is likely to have an impact on the Grade II farmhouse, and would have a detrimental impact on the significance, character and appearance of the conservation area, particularly as the proposed access point requires demolition of a stone frontage wall and a group of traditional farm buildings (all within the conservation area). Mountain Oak Farm is a large site which is slightly divorced from the main body of the village, and does not offer the most logical extension to the built extent. Morrells Farm (SHLAA site 6) is a very large site which has a poor spatial relationship with the village, being out of scale with the settlement and divorced from the main built extent of Sampford Peverell. Though a smaller element of the site could be allocated, there is currently very little development in the vicinity of the site, and as such there is the greater potential for landscape and visual impacts.

#### Sandford

4.138 In Sandford an enlarged site at Fanny's lane (part of an existing allocation) was promoted and is proposed to be allocated. This site is enclosed on three sides by existing development within the settlement. The site is located on grade 2 agricultural land, however a large proportion of the site is already under construction (i.e. the element already allocated). An access is already in place off the site currently being constructed.

#### Alternatives

4.139 Only one other deliverable site was put forward within the village. Land at Sandford (west), like the preferred site, is also located on grade 2 agricultural land. However, this site is on one of the most elevated parts of the village, and is steeply sloping throughout. Its elevated position increases the likelihood of greater landscape and visual impacts, which can be avoided by allocating the Fanny's Lane site.

#### Silverton

In Silverton five sites were promoted, however only two are proposed for allocation. The eastern portion of Land at Old Butterleigh Road is proposed to be allocated for eight dwellings. This site can be accommodated within the existing pattern of built development, having extending in a linear fashion immediately to the north and south. The policy requires that the small area of flood zones 2 and 3 which covers a small area along the eastern boundary should remain undeveloped. The Garage site to the south of Silverton is proposed to be allocated for five dwellings. The site is a brownfield site and is located within the conservation area.

#### Alternatives

4.140 The western portion of Land at Old Butterleigh Road is not proposed as this would result in the loss of the allotments (which would need to be relocated) and is also generally elevated land, with greater potential for visual or landscape impacts. Glebe is located within the conservation area, which could be negatively affected by locating development in this location. Access to the Livinghayes Road site is limited, as the site is located off a private road which is narrow. Refuse lorries do not currently use the lane, which if developed would result in an unacceptable arrangement for future residents who would need to deposit their refuse on collection days at the junction with Coach Road. Land east of Hederman Close would result in the loss of grades 1,2 and 3 agricultural land. This was also the site which received the greatest level of objection during the Options Consultation.

#### Thorverton

4.141 In Thorverton two areas of land to the south of the village were put forward (though they were considered as one site for the purpose of initial assessment). Originally entitled 'Glebe' in the Options Consultation, both unfortunately are grade 1 agricultural land. Advice from the highways authority stated that the western portion was preferred given the better pedestrian access. Devon County Council owns the verge on the western side of the C23 to the north, and therefore a continuous footpath can be delivered from the site to connect in with the existing network in Thorverton. The preferred western portion has subsequently been renamed 'Land south of Broadlands'.

### Alternatives

- 4.142 No alternative deliverable sites were put forward for consideration. The eastern portion of 'Glebe' is not proposed for the reasons outlined above.

### Uffculme

- 4.143 Five sites were considered within the village, however none are proposed for allocation.

### Alternatives

- 4.144 Land off Chapel Hill has subsequently been confirmed as unavailable since inclusion in the Options Consultation. Land west of Uffculme would extend the pattern of the village in a linear fashion along the B3440. This is not preferred, particularly as it would result in long walking distances to the village's facilities, in particular the primary and secondary schools. In addition, inspectors have previously drawn attention to the present boundary of the village, to the front of Harvester, being a defined feature beyond which the village should not be extended. Land off Ashley Road, has planning permission on the southern element. The northern part is within the Hillhead Quarry Minerals Consultation Zone, and is also elevated in comparison with the adjacent housing to the east, which could result in overlooking. For these reasons this site is not preferred. Land adjoining Poynings is located within an area of the village which is elevated, and has a more distinctly rural character, with fewer buildings and with access being from the generally narrow Chapel Hill. The potential for change in character and visual and or landscape impacts has determined the decision not to allocate this site. Land adjacent Sunnydene is located at the edge of the settlement, where the nearest dwellings are very low density and is accessed off the narrow Clay Lane. Though technically deliverable, the nature of the location of the site at some distance along the single carriageway lane is considered a sufficient basis not to allocate. A site at Hillhead Quarry was put forward for consideration for commercial development. However, the site is located within the Minerals Consultation Zone, and is considerably divorced from any settlement. For these reasons the site is not proposed for allocation.

### Willand

- 4.145 In Willand, eight residential, commercial or mixed use sites were put forward for consideration including the strategic site Land at J27 and Willand. As a strategic site, Land at J27 has been discussed under S2 Amount and distribution of development. Of the other sites put forward, it is proposed to allocate a portion of Land East of the M5 which includes a small portion of land adjacent to B3181. This site sits alongside modern housing development on flat land with good access. A sufficient quantity of land is allocated, in order to ensure provision of a buffer to mitigate any noise impact from the nearby motorway. Willand Industrial Estate is an existing allocation with a history of planning permissions and commercial development. Part of the site has remained unconsented and therefore the size of the site is proposed to be reduced. However, the location of the site, on the edge of the settlement adjoining existing commercial development is considered a sustainable location for employment growth.

### Alternatives

- 4.146 Other sites at Dean Hill Road and Lloyd Maunder Way (Residential) are divorced from the main body of Willand by the motorway. Quick's Farm is a flat site which scores favourably but

received the greatest level of objection of all sites in the village during the Options Consultation. Land at North East of Four Crosses Roundabout is a large site which would expand the village beyond the boundary currently delineated by the busy roads of the B3181 and B3440. Other sites have a better relationship with the existing pattern of development and can be incorporated more easily, and would not require new residents to cross busy roads in order to access the village's facilities and services. Access to the Lloyd Maunder (commercial) site is over flood zones 2 and 3. Furthermore although some commercial development is provided in Willand, a village location for significant commercial development is less favourable than other locations in the district, such as the towns. Given the commercial development requirement of the Local Plan Review, the cumulative commercial development of Willand Industrial Estate with Lloyd Maunder (Commercial) is not required.

### **Yeoford**

4.147 One site was considered within the village, however this is not proposed for allocation.

#### *Alternatives*

4.148 In Yeoford a single site at Land off Lower Road was considered during the Options Consultation. The site is in close proximity to the conservation area, and adjacent to very low density housing. The southern portion of the site is steeply sloping and would overlook dwellings within the conservation area. The immediate road network is also very narrow. The site received a wide number of objections during the Options Consultation. For these reasons, the site is not proposed for allocation. No other deliverable sites within the village were included within the Options Consultation.

*Housing Sites in Villages – Bampton to Chawleigh*

Sustainability objective	Bampton						Bickleigh			Bow		Alternative Sites			Bradnich	Burlescombe	Butterleigh	Chawleigh	
	Preferred Sites			Alternative Sites			Alt.	Preferred		Alternative Sites			Pref.	Alt.	Alt.	Alt.	Alt.	Pref.	Alt.
	BA1: Newton Square	BA2: Scotts Quarry (Mixed use)	BA3: Ashleigh Park	South Molton Rd	Land at Ball Hill	Bourchier Close (Mixed use)	Land South of Glen View	B01: Land adjacent to Hollywell	B02: West of Godfrey Gardens	Land adjacent Bow Mill Lane	East Langford Farm	Land adjacent Jackman car park	BR1: Hele Road	Churchyard Field	North West of Homefield	CH1: Barton	Tower Meadow		
A	0	0	0	-1/?	0	0	0	0	0	0	0	0	0	0	0	0	0		
B	0/?	0	0	0	0	0	0/?	0/?	0/?	1/?	-1/?	0/?	-1/?	0	0/?	-2/?	0		
C	+1	+1	+1	+1	+1	+1/?	+1	0	+1	+1	+1	0	+1	+1	+1	+1	+1		
D	+2	+2	-1	-1	0	-1	-2	-1	-1	-2	-1	-1	-1	-2	-1	-1	-1		
E	0	+2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
F	+2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
G	+1	+1	+1	+2	+1	+2	+1	+1	+2	+2	+2	+1	+1	+1	+2	+1	+1		
H	0	0	0	0	-1	0	0	+1	0	0	0	0	-1	-1	0	0	0		
I	0	0	0	-1/?	0	0	0	0	0	0	0	0	0	-1	0	0	0		

*Housing Sites in Villages – Cheriton Bishop to Culmstock*

Sustainability objective	Cheriton Bishop				Cheriton Fitzpaine				Coleb rooke	Coppelstone			Culmstock						
	Pref.	Cheriton Bishop Glebe	Land near the Church	Land adjacent Woodleigh Hall	Land east of Hill View	CF1: Barnshill Close	CF2: Land adjacent school	Cheriton Fitzpaine Glebe	Landboat Farm	Poole Barton	Alt.	CO1: The Old Abattoir	Land adjoining Dulings Meadow	Bewsley Farm	CL1: Linhay Close	CL2: Hunters Hill	Culmstock Glebe and Rackfields	Alternative	The Croft
A	0	0	0	-1	0	0	0	0	0	0	0	0	-1	0	0	0	0	0	-1
B	+1	0	0/?	-1	0	+1	0	0	0	0/?	0	0	0	0	0	0/?	0/?	0/?	0/?
C	+1/?	+1/?	+1/?	+1/?	+1	+1	+1	+1	+1/?	+1	+3	+1	+1	+1/?	+1	+1	+1	+1/?	+1/?
D	-1	-1	-1	-1	-1	-1	-2	-1	-1	-1	-2	+2	-2	-1	-1	-1	-1	-1	-1
E	0	0	0	+1	0	0	0	0	0	0	0	+1	0	0	0	0	0	0	0
F	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
G	+2	+2	+2	+3	+1	+2	+2	+2	+2	+2	+2	+2	+3	+2	+1	+1	+2	+2	+2
H	+2	0	0	-1	0	+1	-2	0	0	0	0	0	-1	0	0	0	0	0	0
I	0/?	0	0/?	0/?	0	0	0	0	0	0/?	+2	0/?	0/?	0/?	0	0	0/?	0/?	0/?

Housing Sites in Villages – Halberton to Newton St Cyres

Sustainability objective	Halberton		Hemyock				Kentis beare	Lapford		Morchard Bishop		Newton St Cyres				
	Pref.	Alt.	Pref.	Alternative Sites			Alt.	Alternative		Pref.	Alternative		Pref.	Alternative		
A	0	0	-1/?	Land South West of Conigar Close	Culmbridge Farm	Land north of Culmbridge Farm	Land adj cemetery	Land by Kentisbeare Village Hall (Mixed use)	Land between the Primary School and the Church	Land South of Sandhurst	MO1: Greenaway	Tatepath Farm	Church Street	NE1: Court Orchard	Land west of Tytheing Close	Land east of Tytheing Close
B	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0	0	0/?	-1	0/?	0/?	0/?	0/?
C	+1	+1/?	+1	+1/?	+1	+1	+1/?	+1	+2	+2/?	+1	+1	+1	+2	+2	+2
D	-2	-2	+1	-1	-1	-1	-1	-2	-1	-1	-1	-1	-1	-2	-2	-2
E	0	0	-1	0	0	0	+2	+2	0	0	0	0	0	0	0	0
F	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
G	+1	+2	+1	+2	+2	+2	+3	+2	+2	+1	+2	+1	+2	+2	+2	+2
H	0	0	0	0	0	0	-1	0	0	0	+1	0	-2	+2	0	0
I	0	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0/?	0	0	0	0/?	+2	0	0

Housing Sites in Villages – Oakford to Silvertown

Sustainability objective	Oakford		Sampford Peverell					Sandford		Shillingford	Silvertown					
	Alt.	Pref.	Higher Town	Land off Whitnage Road	Land at Mountain Oak Farm	Morrells Farm(Mixed use)	Morrells Farm adj the main road	SAP1: Fannys Lane	Land at Sandford (West)	Alt.	Land off Bowdens Lane	S11: Land at Old Butterleigh Road	S12: The Garage	Glebe	Livinghayes Road	East of Hederman Close
A	0	0	0	0	-1	-1	0	0	-1	0	0	0	0	0	0	0
B	0/?	0	0/?	0/?	0/?	-1/?	-2	0	0/?	0	0	-1	0/?	0	0	0
C	+1/?	+2	+2	+2/?	+2/?	+2/?	+2/?	+1	+1	+1	0	+1	+1/?	+1/?	+1/?	+1/?
D	-1	+2	-2	-1	-1	-2	-1	-2	-2	-1	-2	+2	-2	-2	-1	-2
E	0	+1	0	0	+1	+3	0	0	0	0	0	0	0	0	0	0
F	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
G	+1	+1	+2	+2	+3	+3	+2	+2	+2	+2	+1	+1	+2	+1	+2	+2
H	-1	+2	0	-1	-1	-1	0	0	0	-1	0	0	0	0	0	0
I	-2	0	-1/?	0	0/?	0/?	0/?	0	0/?	-1	0	0	0/?	-2	0/?	0/?

*Housing in Villages – Thorverton to Yeoford, including Junction 27 adjoining Willand*

Sustainability objective	Thorverton	Uffculme					Willand				Yeoford	J27 adj Willand	
	Pref. Site	Alternative Sites					Pref. Site	Alternative Sites			Alt. Site	Alt. Site	
	TH1: South of Broadlands	Land adjoining Poynings	Land adjacent Sunnydene	Land off Chapel Hill	Land off Ashley Road	Land west of Uffculme	W1: Land east of M5	Quicks Farm	Dean Hill Road	Land NE of Four Crosses Roundabout	Lloyd Maunder Way	Land off Lower Road	Land at M5 J27 and adj Willand
A	0	-1	0	0	0	0	0	0	-1	-1	0	0	-2/?
B	0/?	0	0	0	0	-2/?	0	0/?	-1	-1/?	-1	0/?	0/?
C	0	+1	+1	+1	+1	+1	+1	+1	+1	+1	+1	+2	0/?
D	-2	-1	-1	-1	-1/?	-1	-1	-1	-2	-1	-1	-1	-2
E	0	0	0	0	0	0	0	0	0	+1	0	0	+1
F	0	0	0	0	0	0	0	0	0	0	0	0	0
G	+1	+2	+1	+2	+2	+2	+2	+2	+2	+3	+2	+1	+3
H	+1	0	?	0	0	-1	+1	0	0	-2	0	0	-2
I	0	0	-1	0/?	0/?	0	0/?	0	0	0/?	0	0	+2/?

**Commercial Sites in Villages including Junction 27 adjoining Willand site**

Sustainability objective	Bampton		Bow		Hemyock	Kentisbeare	Sampford Peverell		Uffculme	Willand		J27 adj Willand
	Preferred	Alt. Site	Alternative Sites	Alt. Site	Alt. Site	Alt. Site	Pref. Site	Alt. Site	Alt. Site	Pref. Site	Alt. Site	Alt. Site
	BA2: Scotts Quarry (Mixed use)	Bourchier Close (Mixed use)	South of Ifter Cross	South West of Junction Road	Brookridge Timber	Land by Kentisbeare Village Hall (Mixed use)	SP1: Former Tiverton Parkway Hotel (Mixed use)	Morrells Farm (Mixed use)	Hill Head Quarry	W12: Willand Industrial Estate	Lloyd Maunder	Land at M5 J27 and adj Willand
A	0	0	0	0	-1	0	0	-1	0/?	0	0/?	-2/?
B	0	0	0/?	0/?	0	0/?	0	-1/?	-1/?	+1/?	0/?	0/?
C	+1	+1	+1	+1	-1	+1	+2	+2/?	-1	+1	0/?	0/?
D	+2	-1	-2	-2	+2	-2	+2	-2	-3/?	0	-1	-3/?
E	+2	+2	+2	+2	+2	+2	+1	+3	+3	+3	+2	+3
F	0	0	0	0	0	0	0	0	0	0	0	-3/?
G	+1	+2	0	0	0	+2	+1	+3	+2	0	0	0
H	0	0	0	0	-1	0	+2	-1	-1	0	0	+2
I	0	0	0	0	0	0/?	0	0/?	0/?	0	0	+2/?

## Managing Development Policies

### Reasons for selecting development management policy alternatives

- 4.149 The Local Plan Part 3: Development Management Policies (LP3) formed the latest set of adopted development management policies and the baseline position for the Local Plan Review. The Scoping Report consultation recognised that these policies would be newly adopted as the Local Plan Review progressed and that only minor adjustments would be required to amend policies in response to updates to national policy or guidance and any lessons learnt through implementation. This approach was widely supported through consultation.
- 4.150 The Options Consultation took forward this approach but sought to predict where changes would be required. The most notable changes anticipated would be from the Department for Communities and Local Government (DCLG) consultation on the Housing Standards Review which could impact on a range of policies including; AL/IN/6 Carbon Footprint Reduction (Merton Rule), DM2 High Quality Design (Building for Life), DM3 Sustainable Design (Code for Sustainable Homes), DM14 Design of Housing (Lifetime Homes) and DM15 Dwelling Sizes. Policy DM5 Renewable and Low Carbon Energy would need to be revised to reflect the new Government guidance in July 2013. Amendments were also proposed for DM9 to be replaced by a new Rural Exception sites policy and AL/DE/7 to reflect planning policy for traveller sites. The NPPF introduces the new designation of Local Green Spaces which should be reflected in policy. Self-build or custom build housing was also expected to warrant a new policy. Minor changes to DM16 Town Centre development and DM18 Development outside town centres would be needed to reflect Bampton's proposed change in status from a town to a village.
- 4.151 Proposed changes in the options consultation alongside other consistency issues have been addressed in the Local Plan Review. The presumption in favour of sustainable development has been deleted as it is no longer required by the Planning Inspectorate. Policy on Sustainable Design has been deleted alongside the Building for life component of Policy High Quality Design in response to the Housing Standards Review proposed by national government. The policy on Waste Management has been deleted at the request of DCC as it is replicated at a higher level within the Devon Waste Plan. The policy on Renewable and Low Carbon energy has been revised. A policy for the cross subsidy of affordable housing on exception sites is deleted. Rural exception sites, now includes low-cost housing. Policy on the Design of Housing has removed lifetime homes standard. The policy on Dwelling Sizes has been amended to reflect national standards. Bampton has been removed as a town from policies on Town centre development and Development outside town centres. Policy on the Protection of recreational land and buildings has been revised to include the protection of Local Green Spaces and makes reference to the role of neighbourhood plans as an alternative route for designation. Policy on Green Infrastructure in Major Development has been revised to remove reference to open space provision which is now included in Policy S5 Public open spaces. Policy on Other protected sites has been revised to make reference to priority protected habitats defined by UK and Devon Biodiversity Action Plans.
- 4.152 The remaining DM policies have been taken forward largely unaltered with no strategic alternatives identified as policies have generally been developed to reflect the NPPF position, locally or are written to reflect the Local Plan Reviews supporting evidence base. Please note

that the numbering of policies in the Local Plan Review have changed from the Local Plan Part 3: Development Management Policies document due to deletions and amendments of policies during the Local Plan Review process. Please see Appendix 2 for a more detailed description of the assessments.

**Managing Development Policies**

Sustainability Objective	DM1: High quality design	DM2: Renewable and low carbon energy	DM3: Transport and air quality	DM4: Pollution	DM5: Parking	DM6: Rural exception sites	DM7: Gypsy and traveller accommodation	DM8: Rural workers' dwellings	DM9: Conversion of rural buildings	DM10: Replacement dwellings in rural areas	DM11: Residential extensions and ancillary development	DM12: Design of housing	DM13: Dwelling sizes	DM14: Town centre development	DM15: Development outside town centres	DM16: Fronts of shops and business premises	DM17: Rural shopping	DM18: Rural employment development	DM19: Protection of employment land	DM20: Agricultural development	DM21: Equestrian development	DM22: Tourism and leisure development	DM23: Community facilities	DM24: Protection of Local Green Space and recreational land/buildings	DM25: Development affecting Heritage Assets	DM26: Green infrastructure in major development	DM27: Protected landscapes	DM28: Other protected sites	DM29: Enforcement
A	+2	+2	0	+2	0	0	-1	-1	0	+2	0	+2	-1	0	0	0	0	-1	0	0	0	0	0	0	0	+2	+2	+2	
B	+3	+2	0	0	0	0	-1	0	0	+2	0	+3	+1	+2	0	+2	0	0	-1	+2	0	0	0	+3	+1	+2	0	+2	
C	+3	+3	+2	0	0	0	+1	-1	-1	0	-1	+2	0	+2	+2	0	-1	-1	+2	0	0	-1	0	0	+2	-2	0	+2	
D	+1	+3	0	0	0	0	0	-1	0	0	+1	+1	0	0	0	0	0	0	+2	0	0	+1	+2	0	+2	0	0	0	
E	0	+1	0	0	0	0	+1	+2	0	0	+2	0	0	+2	+2	0	+2	+2	+2	+2	0	+2	+1	+2	-1	+2	0	0	
F	0	0	+2	+2	0	0	0	0	0	0	0	0	0	+2	+2	+1	+2	0	0	0	0	0	+1	0	0	0	0	0	
G	+2	0	0	0	0	+3	+2	+2	+2	+2	0	+3	+1	+2	0	0	0	0	0	0	0	0	-1	-1	-1	-1	0	0	
H	+2	0	+2	+2	+1	+1	+2	+1	0	0	0	+2	+1	0	0	0	0	0	0	0	0	0	+2	+1	0	+2	0	+2	
I	+2	+2	0	0	+1	-2	-1	-2	-2	0	0	0	0	0	0	0	0	0	0	0	-1	-1	+3	0	0	+3	0	+2	

## 5 Monitoring

5.1 Monitoring is important to understand the characteristics of the local area, assess the impact of policies and determine whether the strategy is delivering sustainable development so that the policies can be reviewed as appropriate. The Local Plan Review contains local indicators and targets to measure the Council’s performance against relevant policies and legislation as well as any significant environmental effects. The monitoring outcomes are reported annually in Mid Devon District Councils’ Monitoring Report which provides information on the following matters:

- Progress of local plans including the timetable for completion, stage reached and reasons for any delay;
- Any local plans or supplementary planning documents that have been approved or adopted, including relevant dates;
- Decisions not to implement any Local Plan Review policy including reasons and steps to implement the policy in the future;
- The number of market and affordable dwellings built in the reporting period and since the relevant Local Plan Review policy target was introduced;
- Any neighbourhood plans or development orders made in the district;
- Progress on the implementation of the Community Infrastructure Levy, if any; and
- Actions taken to ensure cooperation with other local authorities and prescribed organisations under the ‘duty to cooperate’.

5.2 For convenience the Local Plan Review monitoring indicators, relevant policies and targets are reproduced in the table below.

### Monitoring indicators

Indicator	Relevant Policies	Target	Implementation Agencies	Comments
<b>Housing</b>				
Housing trajectory showing net additional dwellings from 2013-2033	S2; S3; S4; S10; S11; S12; S13	Annual completions of 360 dwellings	Development industry, MDDC	
Affordable housing completions; number of dwellings	S1; S3	Annual average completions 100 per year.	MDDC, development industry, registered providers, Housing and Communities Agency	

<b>Indicator</b>	<b>Relevant Policies</b>	<b>Target</b>	<b>Implementation Agencies</b>	<b>Comments</b>
Affordable housing on rural exception sites	S3; DM6	>50% affordable housing	MDDC, development industry, registered providers, Housing and Communities Agency	Proportion of market housing on rural exception sites should be lower than that of affordable housing.
Net additional gypsy and traveller pitches	S3; DM7		MDDC	
Self-build completions	S3	5% on sites of 20+ dwellings	MDDC, development industry	
Sizes and types of dwellings completed	S1; S3; DM13	No target	MDDC, development industry	
Net density of new residential development	S9; DM1	None	MDDC, development industry	Policies do not set minimum housing densities but promote the efficient and effective use of land.
Availability of land for housing	S3; S4	>105% housing supply against requirement	MDDC, development industry	Target applied to whole district. Target will be revised to >120% if persistent under-delivery of housing is proven.
Development of housing on allocated sites	S3 S4 All housing allocations	>50% of completions	MDDC, development industry	
Total amount and percentage of housing development (including conversions) on previously developed land.	S1	No target	MDDC, development industry	
Number of parking spaces provided in new residential developments	DM5	≥1.7 car parking per dwelling	MDDC, development industry	

Indicator	Relevant Policies	Target	Implementation Agencies	Comments
<b>Commercial</b>				
Total amount of additional commercial floorspace for the whole district and individually for Tiverton, Cullompton, Crediton and rural areas	S2; S6; S10; S11; S12; S13; DM14; DM15, DM18	Average annual completions (square metres) Mid Devon 7700 Tiverton 1540 Cullompton 3850 Crediton 770 Rural Areas 1540	MDDC, development industry	Monitoring reports will break down the provision of use classes A1-A5, B1-B8, C1-C2, D1-D2 and sui generis uses.
Development of employment on allocated sites	S6; All commercial allocations	>50% of completions	MDDC, development industry	
Losses of commercial land in local authority area	S6; DM14; DM15; DM19	No Target	Mid Devon District Council, development industry, businesses	Loss of commercial land will be broken down according to use class.
Number of active businesses	S1; S2; S6	Maintain or increase number of active businesses.	MDDC, Heart of the South West Local Enterprise Partnership, private sector	
Job Seekers Allowance as a proportion of working age population each April	S1; S6	Remain below regional average	MDDC, development industry, business sector	Gives indicator for deprivation and employment.
Total amount of floorspace for town centre uses, in total and within town centres (Classes A1, A2, B1a and D2)	S6; S7	No target	MDDC, development industry, retail business sector, leisure industry.	

<b>Indicator</b>	<b>Relevant Policies</b>	<b>Target</b>	<b>Implementation Agencies</b>	<b>Comments</b>
Total amount of floorspace for town centre uses out of town centres (Classes A1, A2, B1a and D2)	S6; DM14; DM15	No target	Mid Devon District Council, development industry, retail business sector, leisure industry.	To monitor edge-of-centre and out-of-centre development, mainly retail.
A1 shops in primary shopping frontages.	S7; DM14	>65%	Mid Devon District Council, development industry, retailers	
Total amount and percentage of commercial floorspace on previously developed land.	S1	No target	MDDC, development industry	
<b>Infrastructure</b>				
Community Infrastructure Levy. Monitor annual receipt of CIL.	S8	No target.	MDDC, development industry	
Public open space provision and accessibility. Applications complying/failing to comply with quantity and access standards in Policy S5	S1; S5; S8	No target	MDDC, development industry, town and parish councils, Sport England, private and voluntary organisations.	Policy S5 sets out standards for open space provision. Smaller sites may provide financial contributions in lieu of onsite open space, with these funds being directed to the provision or improvement of public open space elsewhere.
Strategic Housing and Commercial Land Availability Assessment	S3; S4; S6	To review SHLAA/SCLAA when the Local Plan is reviewed	MDDC, development industry, infrastructure providers	

<b>Indicator</b>	<b>Relevant Policies</b>	<b>Target</b>	<b>Implementation Agencies</b>	<b>Comments</b>
Services available in towns and rural areas	S8; S10; S11, S12; S13; S14	No reduction in services	MDDC, Devon County Council, other organisations	Services include: Public transport, educational facilities, convenience stores, community halls
Loss of community facilities	S1; DM23	No total loss in settlement	MDDC, development industry	
<b>Environment</b>				
Number of Conservation Area Appraisals and Conservation Area Management Plans	S9	1 new or updated CAA/MP per year	MDDC	
Habitat surveys (where applicable) for consented developments demonstrate no loss in biodiversity.	S1; S9	100%	Natural England, MDDC, development industry	No loss may be achieved through avoidance, mitigation and compensation of impacts.
Developments permitted on protected sites (habitats)	S1; S9; DM28	No target	MDDC, Natural England, development industry	Policy directs development away from protected sites subject to criteria, so the number of consents should be low.
Ecological status of water bodies	S1; S9; DM4	No target	MDDC, development industry, Environment Agency.	Target in South West River Basin Management Plan is to achieve good ecological status for water bodies and protected areas by 2015. The Environment Agency monitors water quality.

<b>Indicator</b>	<b>Relevant Policies</b>	<b>Target</b>	<b>Implementation Agencies</b>	<b>Comments</b>
Consented renewable energy development by type and megawatts.	S1; S9 DM2	No target	Mid Devon District Council, development industry.	
Number of heritage assets added to the local register	DM25	No target	Mid Devon District Council, development industry, English Heritage	
Air Quality Management Areas	S1; S11; S12; DM3; DM4	Reduction in air pollutants within AQMAs	MDDC, development industry, Devon County Council, Highways Agency	
<b>Enforcement</b>				
Number of planning enforcement cases, notices and prosecutions	DM29	No target	MDDC	

## 6 Conclusions

- 6.1 The policies and site allocations in the Local Plan Review and the reasonable alternatives considered during its preparation have been subject to a detailed appraisal against the SA objectives which were developed at the scoping stage of the SA process. The SA has played an integral role in the development on the Local Plan Review. It has been used to consider the various strategic options and inform the most sustainable approach for the District. The SA has led to the refinement of policies to minimise adverse impacts and has ensured that sustainability issues for the District are addressed. The wording of the specific site policies seeks to ensure that a potential negative effects resulting from the development of sites is addressed at masterplanning and/or planning application stage. In general, the emerging Local Plan Review has been found to have a wide range of positive and significant positive effects on the objectives both cumulatively and through individual policies, although a number of potentially adverse impacts still remain. Recommendations made in previous iterations of the SA report and this proposed submission SA report has generally been thoroughly addressed, which has provided mitigation for potential adverse effects for both individual policies/proposals and the Local Plan Review as a whole.
- 6.2 The SA Report will be available for consultation alongside the new Local Plan Review Proposed Submission (February 2015). Following this consultation, all responses will be fully reviewed and addressed where appropriate. Depending on the extent of any changes made to the Local Plan Review, further SA work may need to be undertaken in relation to the Submission version. Any such SA work will either be presented in a SA note, as an addendum to this report, or an updated version of the whole report (depending on the scale of changes to the Local Plan Review). Monitoring will be used to assess both the positive and negative effects of implementing the Local Plan Review.