

## **‘SUSTAINABILITY APPRAISAL UPDATE (INCORPORATING CONSULTANT LUC RECOMMENDATIONS) JANUARY 2018.**

### **Executive Summary of SA Review Process (2018)**

Sustainability Appraisals (SA) aim to make plans more sustainable and responsive to its environmental, social and economic effects. It is a legal requirement for Local Plans to have an SA carried out during its preparation.

The Mid Devon Local Plan Review is supported by an SA. Because Local Plans are evolving (“iterative”) processes, the SA is set out in several documents. These are:

- Scoping Report (2013)
- Interim Report (2014)
- SA Proposed Submission Report (2015).
- SA Update (January 2017) (The work which led to the publication of this SA Update informed the Council’s decision to publish the Proposed Modifications Version of the Local Plan Review).

During the course of preparing for the opening of the examination of the Local Plan Review in September 2017, the Council concluded, on the receipt of advice from its appointed barrister, that there would be benefit in obtaining an independent review of the SA Update. The Council appointed Land Use Consultants (LUC) to carry out that review. Specifically, it sought advice on:

- Whether there are reasonable alternatives to Policy J27 that should have been subject to SA
- Whether there are reasonable alternatives to the concomitant housing allocations (TIV16 and SP2) that should have been considered
- Whether there was a need to assess reasonable alternatives for other Modifications to the Plan.
- Legal compliance.

Following preliminary advice from LUC, the Council undertook to provide a “signposting” report setting out how the SA has been prepared and how options were considered.

Accordingly the Council has prepared the “Sustainability Appraisal Update (incorporating LUC recommendations) (January 2018)” herein referred to as SA Update (2018) and “Executive Summary of SA Review process (2018)”.

The SA Update (2018) and “Review of Sustainability Appraisal Update in relation to the main modifications made to the Mid Devon Local Plan Review Submission Version: Review of Legal Compliance (LUC, January 2018)” are referred to as LUC SA Update Review (2018). Together they have not sought to identify additional options, given the need to allocate only 260 additional dwellings and the large number of rejected reasonable alternative site options. LUC consider the approach of reconsidering previously rejected reasonable site options to meet the 260 dwelling requirement was appropriate and proportionate. The SA Update (2018) and LUC SA Update Review (2018) also do not re-assess sites. LUC advised that the additional work required was not new appraisal work, but the collation of work undertaken to date. The SA Update (2018) and LUC SA Update Review (2018) explain how options have been assessed and where the detailed assessments can be found.

Broadly the SA Update (2018) sets out that there are limited “reasonable alternatives” to J27 since the proposal must be taken as a whole and cannot be split into smaller parts. The options of a larger development at J27 and the option of not including J27 have been assessed.

During the course of the SA process, there were a number of alternative sites considered. The SA Update (2018) sets out a table of potential reasonable alternatives to the proposed housing sites at Blundells School (TIV16) and Higher Town Sampford Peverell (SP2) allocated in the Mid Devon Local Plan Review Submission Version incorporating proposed modifications. As stated by LUC, the reconsideration of previously rejected options was a proportionate and appropriate approach.

The reasons why these have not been proposed in preference to the proposed sites at Blundells School (TIV16) and Higher Town Sampford Peverell (SP2) is reiterated in the SA Update (2018) (see table 6 below). Broadly such sites have not been proposed because they would form part of larger urban extensions; be separate from village envelopes; or have greater impact on the historic or rural character of the locality than the proposed sites.

The LUC SA Update Review (2018) concludes that the Council has identified and considered reasonable alternatives in line with the legal requirements, which is made clear through the Council's SA Update (2018). Duly made representations made on sites allocated in the Mid Devon Local Plan Review Submission Version incorporating proposed modifications will be considered by an appointed Inspector through the examination of this local plan.

## Mid Devon District Council response to LUC's recommendations (January 2018)

### Item 1 – Provision of a signposting table

Appendix 1, Table A1.1 of the LUC SA Update Review (2018) recommends that a signposting table should be prepared to enable MDDC to identify how the SA has met the Strategic Environmental Appraisal (SEA) Directive Requirements.

1. The Council has a duty to consider the sustainability of its plans through the Planning and Compulsory Purchase Act 2004 (as amended). It also has to prepare a Strategic Environmental Appraisal (SEA) as a result of requirements contained in the Environmental Assessment of Plans and Programmes Regulations 2004. It is believed that the requirements of both pieces of legislation have been met by the Sustainability Appraisal (SA), which has been prepared following Government guidance.
2. The SA is an iterative, ongoing process and integral to plan making. During the process of preparing the Local Plan Review, consultation was held in July 2013 on the Scoping Report and SA Scoping Report, January 2014 on the Options Report and SA Interim Report, February 2015 on the Proposed Submission document and the SA Proposed Submission Report and January 2017 on the Proposed Submission (incorporating proposed modifications) document and the SA Update Report.
3. The interim SA (2014) provided a signposting table in Chapter 1 which set out how the SEA Directive and Regulations requirements were met at the time of publishing the 2014 report. The Sustainability Appraisal Proposed Submission Report (2015) provided an updated signposting table in Chapter 1 which set out how the SEA Directive and Regulations requirements has been met at the time of publishing the 2015 report which included compliance with any items not previously covered by previous iterations of the SA.
4. As advised by LUC a further signposting table has been provided. For clarity the inclusion of each stage of the SA process is provided where compliance with the SEA Directive requirement has been met.

Table 1 – Signposting table, 'Information to be included in the Environmental Report'

SEA Directive Requirements	Covered in SA
<b>Information to be included in the Environmental Report – Article 5 and Annex 1 of SEA Directive</b>	
a) an outline of the contents, main objectives of the plan, and relationship with other relevant plans and programmes;	<p><b>Sustainability Appraisal Scoping Report (2013):</b>                      'Chapter 1 Introduction' of this report sets out the contents and main objectives of the plan.                      'Chapter 2 Relevant plans and programmes' of this report sets out the relationship with other relevant plans and programmes.                      'Chapter 7 Appendix: Reviewed plans and programmes (full list)' provides a full list of reviewed plans and programmes.</p> <p><b>Interim Sustainability Appraisal (2014):</b>                      'Chapter 1 Background' of this report sets out an outline of the contents and main objectives of the Local Plan. This chapter also identifies the compliance of report at the time of publication with the SEA Directive and Regulations.                      'Chapter 2 Sustainability Context'. This chapter sets out the conclusions from the review of relevant plans and programmes.                      'Appendix 1: Full review of plans and programmes'. This appendix provides a full review of plans and programmes.</p> <p><b>Sustainability Appraisal Proposed Submission Report (2015):</b>                      'Chapter 1 Background' of this report sets out the contents and main objectives of the Local plan. This</p>

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	<p>chapter also identifies the compliance of the report at the time of publication with the SEA Directive and Regulations.</p> <p>'Chapter 2 Sustainability Context'. This chapter sets out the conclusions from the review of relevant plans and programmes.</p> <p>'Appendix 1: Full review of plans and programmes'. This appendix provides a full review of plans and programmes.</p>
<p>b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;</p>	<p><b>Sustainability Appraisal Scoping Report (2013):</b>  'Chapter 3 Baseline information about Mid Devon' of this report considers the relevant aspects of the current state of the environment and considers trends that are likely to continue without the implementation of the plan e.g. likely historic trends of biodiversity expected to continue and the trend for the delivery of sustainable homes based on existing relevant plans and programmes.</p> <p><b>Interim Sustainability Appraisal (2014):</b>  'Chapter 2 Sustainability Context' looks at the relevant aspects of the state of the environment and considers trends that are likely to continue without the implementation of the plan.</p> <p><b>Sustainability Appraisal Proposed Modifications Report (2015):</b>  'Chapter 2 Sustainability Context' looks at the relevant aspects of the state of the environment and considers trends that are likely to continue without the implementation of the plan. The likely Evolution of the State of the Environment without Implementation of the Local Plan Review is set out in full at para 2.60 and accompanying table.</p>
<p>c) the environmental characteristics of areas likely to be significantly affected;</p>	<p><b>Sustainability Appraisal Scoping Report (2013):</b>  'Chapter 2 Relevant plans and programmes' of this report sets out the relationship with other relevant plans and programmes which have been grouped into themed areas. This first picks up on the potential impact of the Plan, in particular how the promotion of new development may impact on these themes.</p> <p>'Chapter 3 Baseline information about Mid Devon' of this report considers the relevant aspects of the current state of the environment, it provides some identification of existing environmental characteristics that could be affected by the Plan e.g. Natural England has advised that any development that encourages through-traffic through the A361 may impact on the Culm Grasslands SAC.</p> <p>'Chapter 4 Sustainability issues and problems' of this report summarises the sustainability issues within Mid Devon identified by the Sustainability Appraisal scoping report.</p> <p>'Chapter 7 Appendix: Reviewed plans and programmes (full list)' provides a full list of reviewed plans and programmes and provides greater detail on environmental characteristics likely to be affected and therefore which should be considered as part of the</p>

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	<p>Local Plan Review.</p> <p><b>Interim Sustainability Appraisal (2014):</b>  ‘Chapter 2 Sustainability context’ looks at the relevant aspects of the state of the environment including the consideration of environmental characteristics of areas likely to be significantly affected.  ‘Appendix 1: Full review of plans and programmes’ provides a full list of reviewed plans and programmes and provides greater detail on environmental characteristics likely to be affected and therefore which should be considered as part of the Local Plan Review.</p> <p><b>Sustainability Appraisal Proposed Submission Report (2015):</b>  ‘Chapter 2 Sustainability context’ looks at the relevant aspects of the state of the environment including the consideration of environmental characteristics of areas likely to be significantly affected.  ‘Appendix 1: Full review of plans and programmes’ provides a full list of reviewed plans and programmes and provides greater detail on environmental characteristics likely to be affected and therefore which should be considered as part of the Local Plan Review.</p> <p><b>Sustainability Appraisal Update (2017)</b>  The SA Update (2017) is an addendum to the SA work undertaken to date. As such the context and methodology previously set out in the SA still applies. The SA framework objectives borne out of previous iterations of the SA are repeated in the SA Update for clarity.</p>
<p>d) any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;</p>	<p><b>Sustainability Appraisal Scoping Report (2013):</b>  ‘Chapter 3 Baseline information about Mid Devon’ of this report considers the relevant aspects of the current state of the environment, it provides some identification of existing environmental problems which are relevant to the plan including advice from Natural England on the impact of through-traffic on the A361 on the Culm Grasslands SAC.</p> <p><b>Interim Sustainability Appraisal (2014):</b>  ‘Chapter 2 Sustainability Context’ looks at the relevant aspects of the state of the environment it provides some identification of existing environmental problems which are relevant to the plan including advice from Natural England on the impact of through-traffic on the A361 on the Culm Grasslands SAC.</p> <p><b>Sustainability Appraisal Proposed Submission Report (2015):</b>  ‘Chapter 2 Sustainability Context’ looks at the relevant aspects of the state of the environment it provides some identification of existing environmental problems which are relevant to the plan including advice from Natural England on the impact of through-traffic on the A361 on the Culm Grasslands SAC.</p>
<p>e) the environmental protection objectives, established at</p>	<p><b>Sustainability Appraisal Scoping Report (2013):</b>  ‘Chapter 2 Relevant plans and programmes’ of this</p>

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<p>international, Community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;</p>	<p>report sets out the relationship with other relevant plans and programmes which have been grouped into themed areas. This chapter identifies factors and policy defined by EU or UK legislation, national policies and other plans and strategies at a local level which are relevant to the plan, including environmental considerations to be taken into account during the Plan preparation.</p> <p>'Chapter 7 Appendix: Reviewed plans and programmes (full list)' provides a full list of reviewed plans and programmes which is summarised in Chapter 2. The chapter provides sustainability conclusions under each theme which include environmental considerations to be taken into account in the Plan's preparation.</p> <p><b>Interim Sustainability Appraisal (2014):</b>  'Chapter 2 Sustainability Context' of this report sets out the relationship with other relevant plans and programmes which have been grouped into themed areas. This chapter identifies factors and policy defined by EU or UK legislation, national policies and other plans and strategies at a local level which are relevant to the plan, including environmental considerations to be taken into account during the Plan preparation.</p> <p>'Appendix 1 Full review of plans and programmes' provides the full list of reviewed plans and programmes which is summarised in Chapter 2. The chapter provides sustainability conclusions under each theme which include environmental considerations to be taken into account in the Plan's preparation.</p> <p><b>Sustainability Appraisal Proposed Submission Report (2015):</b>  'Chapter 2 Sustainability Context' of this report sets out the relationship with other relevant plans and programmes which have been grouped into themed areas. This chapter identifies factors and policy defined by EU or UK legislation, national policies and other plans and strategies at a local level which are relevant to the plan, including environmental considerations to be taken into account during the Plan preparation.</p> <p>'Appendix 1 Full review of plans and programmes' provides the full list of reviewed plans and programmes which is summarised in Chapter 2. The chapter provides sustainability conclusions under each theme which include environmental considerations to be taken into account in the Plan's preparation.</p>
<p>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</p>	<p><b>Interim Sustainability Appraisal (2014):</b>  'Appendix 2 Sustainability appraisal of policies and site options' presents the findings of appraisal work that has been carried out. The effects are illustrated using matrices and scoring system set out in 'Chapter 3 Sustainability appraisal methodology'. The likely significant positive and negative effects are shown by applying the scores +3 and -3 respectively. The SA</p>

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<p>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 impacts);</p>	<p>objectives used throughout the SA process address all the required SEA topics. Appendix 2 also includes secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary impacts.</p> <p><b>Sustainability Appraisal Proposed Submission Report (2015):</b>  ‘Appendix 2 Sustainability appraisal of policies and site options’ presents the findings of appraisal work that has been carried out. The effects are illustrated using matrices and scoring system set out in ‘Chapter 3 Sustainability appraisal methodology’. The likely significant positive and negative effects are shown by applying the scores +3 and -3 respectively. The SA objectives used throughout the SA process address all the required SEA topics. Appendix 2 also includes secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary impacts.</p> <p><b>Sustainability Appraisal Update (2017)</b>  Annex 1 ‘Sustainability Appraisal text, methodology and cumulative impact comments’ updates the cumulative effects noted in appendix 2 of the Sustainability Appraisal Proposed Submission Report (2015)</p> <p>Annexes 2 and 3 in the SA Update present the findings of the additional appraisal work that has been carried out. Effects are illustrated using the same matrices and scoring system that was used earlier in the SA process and that is described in paragraphs 2-9 of the SA Update (2017). As described in paragraph 6, likely significant positive and significant negative effects are shown by applying the scores +3 and -3 respectively. The SA objectives used throughout the SA process address all of the required SEA topics.</p> <p>Annex 4 in the SA Update (2017) summarises the updated cumulative sustainability effects of the Local Plan review as a whole, taking into account the changes proposed to the Plan.</p>
<p>g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;</p>	<p><b>Interim Sustainability Appraisal (2014):</b>  ‘Appendix 2 Sustainability appraisal of policies and site options’ presents the findings of appraisal work that has been carried out. Under each appraisal a summary of recommendations are made to prevent, reduce or as fully as possible offset any significant adverse effects on the environment of implementing the plan.</p> <p><b>Sustainability Appraisal Proposed Submission Report (2015):</b>  ‘Appendix 2 Sustainability appraisal of policies and site options’ presents the findings of the appraisal work that has been carried out. This updated version of the SA introduces a column considering potential mitigation measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan. The revised scores in the final column of the SA matrices illustrate how the proposed mitigation would</p>

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	<p>affect the SA scores. In a number of places this results in potential significant effects being reduced.</p> <p><b>Sustainability Appraisal Update (2017)</b> Annex 2 considers further reasonable alternatives, new information and comments on the sustainability appraisal of policies and site. Where appropriate measures are recommended as 'Changes to the Plan' to prevent, reduce and as fully possible offset any significant adverse effects on the environment of implementing the plan.</p> <p>The detailed SA matrices in Annex 3 include a column considering potential mitigation measures, and the revised scores in the final column of the SA matrices illustrate how the proposed mitigation would affect the SA scores. In a number of places this results in potential significant negative effects being reduced.</p>
<p>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;</p>	<p><b>Sustainability Appraisal Scoping Report (2013)</b> This appraisal first introduces the proposed framework to assess sustainability in Chapter 5 'A framework to assess sustainability'.</p> <p><b>Interim Sustainability Appraisal (2014)</b> Chapter 3 'Sustainability appraisal methodology' sets out a description of the methodology use to undertake the assessment and the assessment of policy options is undertaken in Appendix 2. Alternatives were not selected at this stage as the report was based on policy options.</p> <p><b>Sustainability Appraisal Proposed Submission (2015)</b> Chapter 3 'Sustainability appraisal methodology' sets out a description of the methodology use to undertake the assessment. This chapter also sets out where there were technical deficiencies in which specific data was not available at the time of the SA assessments an uncertain effect was identified in the full appraisals.</p> <p>Chapter 4 'Reasons for selecting/rejecting policy alternatives' sets out an outline of the reasons for selecting the alternatives dealt with.</p> <p>Appendix 2 'Sustainability appraisal of policies and site options' provides the full appraisal of policy and site options. The appraisal applies the sustainability appraisal methodology including identifying any difficulties encountered in compiling the required information, where there were technical deficiencies in which specific data was not available at the time of the SA assessments, an uncertain effect was identified in the full appraisals. Page 192 sets out the appraisal guidance followed when applying the pre-mitigation scoring system to potential allocation sites. It's noted that in some cases the scoring could differ from the guidance due to site specific context and a cumulative approach was taken when assessing allocation sites within each objective.</p> <p>Appendix 3 'Undeliverable site options' sets out the sites which were not deemed deliverable by the SHLAA panel.</p>



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	<p><b>Sustainability Appraisal Update (2017)</b>            Paragraphs 2-9 of the SA Update (2017) describe the methodology that has been used throughout the SA process including where there were technical deficiencies in which specific data was not available at the time of the SA assessments an uncertain effect was identified in the full appraisals. The table following paragraph 9 sets out the assumptions that have been applied to the SA of potential site allocations. Information about the reasons for selecting additional reasonable options for appraisal is provided in Annex 2 of the SA Update (2017).</p>
i) a description of the measures envisaged concerning monitoring;	<p><b>Sustainability Appraisal Proposed Submission (2015)</b>            Chapter 5 'Monitoring' of the report sets out a description of the measures envisaged concerning monitoring.</p>
j) a non-technical summary of the information provided under the above headings.	<p><b>Sustainability Appraisal Proposed Submission (2015)</b>            A non-technical summary was published with the full Sustainability Appraisal Proposed Submission Report (2015).</p>
<p>The report must include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Article 5.2)</p>	<p><b>Sustainability Appraisal Scoping Report (2013)</b>            Provided an introduction and context of Mid Devon District and the proposed Plan. The Report considered relevant plans and programmes, baseline information about Mid Devon, Sustainability issues and problems and set out a framework to assess sustainability for consultation.</p> <p><b>Interim Sustainability Appraisal (2014)</b>            Provided the same provisions as the Sustainability Appraisal Scoping Report (2013) and was updated to demonstrate the latest information available at the time of publication and in response to the initial consultation the Sustainability Appraisal Scoping Report (2013). This report also first introduces the findings of appraisal work on the policies proposed in the Local Plan Review and the likely significant effects. It provides a description of how the assessment was undertaken including any difficulties encountered in compiling the required information. It also makes recommendations for mitigation measures. However decisions for preferred alternatives were not taken at this stage as the Plan was out for consultation on the options for the Local Plan Review. Chapter 1 set out the compliance with the Strategic Environmental Assessment Directive and Regulations which identifies three areas that would be more appropriately addressed at a later stage of the SA process; the outline of the reasons for selecting alternatives dealt with, a description of the measures envisaged concerning monitoring and the non-technical summary.</p> <p><b>Sustainability Appraisal Proposed Submission (2015)</b>            Provided the same provisions of the Interim</p>

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	<p>Sustainability Appraisal (2014) and was updated to demonstrate the latest information available at the time of publication. The update also responded to the consultation on the Interim Sustainability Appraisal (2014). This report introduces a mitigation column in the appraisals which sets out revised scores demonstrating how the mitigation proposed could affect the SA scores. The Sustainability Appraisal Proposed Submission (2015) also sets out an outline of reasons for selecting the alternatives dealt with, a description of the measures envisaged concerning monitoring and provides a non-technical summary. The SA Proposed Submission incorporates all of the information reasonably required.</p> <p><b>Sustainability Appraisal Update (2017)</b> As noted in paragraph 1 of the update report, the update to the Sustainability Appraisal has been undertaken to take into account comments made at the 2015 Proposed Submission Stage consultation and proposed modifications to the Local Plan Review. The requirements not met in the SA Update (2017) are met in previous iterations of the Sustainability Appraisal.</p>
<b>Who should be consulted during SEA/SA process</b>	
<p>Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Article 5.4)</p>	<p><b>Sustainability Appraisal Scoping Report (2013):</b> Chapter 6 'Consultation' identifies that the Council provided the opportunity to the three statutory environmental consultation bodies at the time of the scoping report which were Natural England, the Environment Agency and English Heritage (now Historic England). The opportunity to comment on the scope and level of detail of the information contained within the scoping report was also provided to local communities and other bodies on 8 July 2013 for 6 weeks. Every person and organisation including statutory consultees that appeared on the Mid Devon Local Development Framework database at the time of publication was informed of the opportunity to comment on the Local Plan Review Scoping Report and associated documents including the Sustainability Appraisal.</p>
<p>Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Article 6.1, 6.2)</p>	<p><b>Interim Sustainability Appraisal (2014):</b> Chapter 4 'Next steps' invites representations on the contents of the Local Plan Review and this accompanying Sustainability Appraisal. Consultation was held on 24<sup>th</sup> January 2014 for 8 weeks. Every person and organisation including statutory consultees that appeared on the Mid Devon Local Development Framework database at the time of publication was informed of the opportunity to comment on the Local Plan Review Options Consultation Report and associated documents including the Sustainability Appraisal.</p> <p><b>Sustainability Appraisal Proposed Submission (2015)</b> Consultation was held on 9<sup>th</sup> February 2015 for 11</p>

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	<p>weeks. Every person and organisation including statutory consultees that appeared on the Mid Devon Local Development Framework database at the time of publication was informed of the opportunity to comment on the Local Plan Review Proposed Submission Report and associated documents including the Sustainability Appraisal.</p> <p><b>Sustainability Appraisal Update (2017)</b>            Consultation was held on 3<sup>rd</sup> January 2017 for 6 weeks. Every person and organisation including statutory consultees that appeared on the Mid Devon Local Development Framework database at the time of publication was informed of the opportunity to comment on the Local Plan Review Proposed Submission Report (incorporating proposed modifications) and associated documents including the Sustainability Appraisal.</p>
<p>Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Article 7)</p>	<p>Not relevant to the SA of the Mid Devon Local Plan.</p>
<b>Decision-making</b>	
<p>The environmental report and the results of the consultations must be taken into account in decision-making (Article 8)</p>	<p><b>Sustainability Appraisal Scoping Report (2013)</b>            Consultation was undertaken on the Local Plan Review Scoping Report and the Sustainability Appraisal Scoping Report.</p> <p><b>Interim Sustainability Appraisal Report (2014)</b>            The Local Plan Review Options Consultation report was submitted to Cabinet on 9 January 2014 and was agreed for approval for public consultation and authority to be given to the Head of Planning and Regeneration, in consultation with the Cabinet Member for Planning, to make minor editorial changes to the text and maps.</p> <p>Chapter 3 ‘Sustainability appraisal methodology’ of the Interim Sustainability Appraisal Report (2014) sets out a summary of the consultation responses received during 2013 consultation Local Plan Review Scoping Report and the Sustainability Appraisal Scoping Report (2013) and noted that the SA would be updated following consultation to take account of the responses received during the consultation.</p> <p><b>Sustainability Appraisal Proposed Submission Report (2015)</b>            The Local Plan Review Proposed Submission report was submitted to three Cabinet meetings for approval for publication and submission subject to confirmation by Full Council by area (West, Central and East) on 27 November, 4 December and 11 December 2014. Relevant extracts from the Sustainability Appraisal Proposed Submission Report was provided at each Cabinet meeting. The full Sustainability Appraisal was also made available to members on the Council’s website to be considered alongside reports pack.</p>

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	<p>Approval was also sought for the Sustainability Appraisal incorporating the Strategic Environmental Assessment, the Draft Habitats Regulations Assessment and other evidence produced in the process of the plan's preparation to be published for consultation alongside the Local Plan. Thirdly approval was sought for authority given to the Head of Planning and Regeneration, in consultation with the Cabinet Member for Planning, to make minor changes to the text and maps. Final approval by Full Council was made on the 17<sup>th</sup> December 2014 for consultation in 2015.</p> <p>Chapter 3 'Sustainability appraisal methodology' of the Sustainability Appraisal Proposed Submission Report (2015) sets out a summary of the consultation responses received during the two previous consultations on the Local Plan Review and Sustainability Appraisal and notes that the comments were incorporated into the Sustainability Appraisal Proposed Submission Report (2015).</p> <p>Chapter 4 'Reasons for selecting/rejecting policy alternatives' sets out a summary of the reasons for selecting/rejecting the strategic, allocation and development management policy alternatives.</p> <p>A statement of consultation before Local Plan publication was provided at the same time of consultation which set out the main issues raised during previous consultation and how these were responded to. Comments received in previous consultations and how the sustainability appraisal results were taken into account in decision-making are also demonstrated through the Local Plan Review Proposed Submission (February 2015) Consultation Summary Document.</p> <p><b>Request for a J27 implications Report (2016)</b></p> <p>A request by members was made in 2016 for a J27 implications Report which looked at the implications if members were minded to allocate J27 as part of the Local Plan Review Proposed Submission. This report was taken to Cabinet on the 15 September 2016 which set out the history of the J27 proposal and decisions previously made by members and the implications of allocating J27. The report also identified that if members were minded to make a modification to the plan to allocate land at J27, sites for an additional 260 dwellings will also need to be allocated in the Local Plan. Alternative housing option sites were set out to members based on a selection criteria as follows: sites previously consulted on as part of the Local Plan Review Options consultation (January 2014) or received as a local plan representation; sites considered by the Strategic Housing Land Availability Assessment Panel; compliance with the Local Plan Review Distribution Strategy; and proximate to the development proposal at Junction 27.</p> <p>The 2015 SA was publically available at the time the</p>

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	<p>Implications Report was presented to members in 2016 and the draft 2015 SA was presented to members previously in the 2014 Cabinet (27 November, 4 December, 11 December) and Council meetings (17 December 2014). The Sustainability Appraisal was not mentioned in the Implications Report; however the reasons for rejecting site option set out in the Implications Report and the Sustainability Appraisal (2015) are broadly the same. Cabinet proposed a recommendation to Council that a 6 week consultation period take place prior to the submission of the Local Plan, Land at Junction 27 of the M5 be allocated for leisure retail and tourism development and associated additional housing sites giving the extra provision of 260 additional homes be allocated at Blundells Road, Tiverton and Higher Town, Sampford Peverell. The recommendations of Cabinet as set out above were taken to Council on 22 September 2016 and were approved. The plan as a whole was subsequently considered at the meetings of Cabinet on 21 November and Council 01 December 2016 where it was agreed that the Local Plan Review incorporating proposed modifications be publicised and consulted on for 6 weeks, and that delegated authority be given to the Head of Planning and Regeneration in consultation with the Cabinet Member for Planning for the plan's subsequent submission to the Planning Inspectorate for examination together with its supporting documentation. After consultation, the plan was submitted to the Planning Inspectorate together with supporting documentation on 31<sup>st</sup> March 2017 under the delegated authority.</p> <p><b>Sustainability Appraisal Update (2017)</b></p> <p>The Local Plan Review Proposed Submission report (incorporating proposed modifications) was submitted to Cabinet on 21 November 2016 for a recommendation of approval for publication and consultation, and that delegated authority be given to the Head of Planning and Regeneration in consultation with the Cabinet Member for Planning for the plan's subsequent submission to the Planning Inspectorate for examination together with its supporting documentation to full Council. The amended Local Plan Review incorporated the recommendations made at Council on 22 September 2016. A summary of the modifications proposed were summarised in the report pack with the full schedule of modifications appended to the report for viewing.</p> <p>The report references the Sustainability Appraisal and the findings of the Sustainability Appraisal process. The report notes that the Local Plan Review has been subject to Sustainability Appraisal during its preparation. The appraisal is an iterative process informing the development of the Local Plan Review and has been published alongside each stage of consultation. The Sustainability Appraisal assesses</p>

SEA Directive Requirements	Covered in SA
	<p>the likely significant effects of the Local Plan, focussing on the environmental, economic and social impacts. The latest version was updated to consider the latest available evidence including reasonable alternatives proposed through consultation responses. The Sustainability Appraisal Update concludes that the proposals set out in the Local Plan Review together with the schedule of modifications are the most appropriate given the reasonable alternatives available. The report identifies that the Sustainability Appraisal and other updated evidence produced in the process of the plan's preparation will be made available for comment during the Local Plan Review proposed modifications consultation.</p> <p>The report also makes reference to the Planning Policy Advisory Group which considered all paperwork accompanying the report. The report summarises the considerations of the group and their recommendations to Cabinet. The recommendations to Cabinet on the 21 November 2016 were agreed and were submitted to full Council on 01 December 2016. The submission to full Council included the report pack presented to Cabinet which contained reference to the Sustainability Appraisal for approval and were agreed. Para 1 of the Sustainability Appraisal Update (2017) sets out that this update to the Sustainability Appraisal has been undertaken to take into account comments made at the 2015 Proposed Submission Stage consultation and proposed modification to the Local Plan Review. The summary matrices in Annex 2 relating to the additional reasonable alternative options considered for each policy topic include a final row which states which option has been taken forward as a proposed change to the Plan if relevant, or if no changes are proposed to the Plan policies, why this is. Consultation was undertaken on the Sustainability Appraisal Update (2017) and the Local Plan Review Proposed Submission (incorporating proposed modifications) (2017). A statement of consultation was provided at the same time as this consultation which set out the main issues raised during previous three consultations and how these were responded to. Schedule of Proposed Modifications (Proposed Submission consultation) (November 2016) and the Sustainability Appraisal Update (2017) also demonstrate how the results of the consultations were taken into account.</p> <p>Comments received during this consultation including how the sustainability appraisal results were taken into account in decision-making are demonstrated through the Local Plan Review Proposed Submission (January 2017) Consultation Summary Document and the schedule of Proposed Minor Modifications (2017).</p>
<b>Provision of information on the decision</b>	
When the plan or programme is adopted, the public and any	N/A – this requirement should be met at a later stage of the SA process.

SEA Directive Requirements	Covered in SA
<p>countries consulted under Article 7 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>• the plan or programme as adopted</li> <li>• a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>• the measures decided concerning monitoring (Article 9)</li> </ul>	
Monitoring	
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation must be undertaken (Article 10)</p>	<p><b>Sustainability Appraisal Proposed Submission (2015)</b> Chapter 5 'Monitoring' sets out how the Plan will be monitored.</p>

### Item 2 - Summary of SA findings in main body of SA Update

*Para 1.13 of the LUC SA Update Review (2018) recommends that Annex 4 of the SA Update (2017) which includes a summary of updated SA findings could usefully be presented as a conclusions section in the main body of the SA Update.*

5. This amendment is accepted, with Annex 4 to be presented as a conclusions section in the main body of the SA Update.

### Item 3 - Provision of a clearer explanation of work carried out during the SA Update

*Para 1.13 of the LUC SA Update Review (2018) recommends that a clearer explanation of work carried out during the SA Update stage of the Sustainability Appraisal should be provided at the front of the SA Update.*

6. Paragraph 1 of the SA Update sets out the reason for the update which is as follows:

“This update to the Sustainability Appraisal (SA) has been undertaken to take into account feedback from the 2015 Proposed Submission Stage consultation and proposed modifications to the Local Plan Review. The Local Plan Review: Proposed Submission Consultation Sustainability Appraisal (2015) is available on the website at [www.middevon.gov.uk/localplanreview](http://www.middevon.gov.uk/localplanreview) and the main Council office, Phoenix House, Tiverton”

7. The content of the update is presented in four annexes summarised on p.9 of the SA Update. In response to LUC's recommendation it is suggested that the content of the update set out on p.9 is brought forward to sit under paragraph 1. LUC have further recommended that additional text should be provided prior to the contents of the update. As such an additional paragraph is presented below paragraph 1 and the contents of the update previously set out on p.9 of the original update is brought forward to sit under this new paragraph.

**Item 4 – Summary tables of reasonable alternative options that have been appraised and specific modifications.**

*Para 1.14 of the LUC SA Update Review (2018) recommends that the front end of the SA Update could include a summary table of specific modifications and reasonable alternative options that have been appraised. This could be linked to an explanation of how the work set out in the SA Update relates to the schedules of proposed modifications that were published in November (2016) and March (2017).*

8. In response to LUC’s recommendation at the end of the main body of the SA Update it is proposed that the following is included:

Arising from the SA Update (2017), a number of alternatives were identified through comments on the Local Plan Review Proposed Submission Consultation (2015) or new information. A number of modifications were also proposed through the SA Update. For a full account of proposed modifications to the Local Plan Review, including minor amendments not considered to give rise to reasonable alternatives, reference should be made to the Schedule of proposed modifications published in November (2016). This provides a list of proposed modifications following in the Local Plan Review Proposed Submission (incorporating proposed modifications). The schedule of proposed modifications published in March (2017) provides a list of proposed modifications following the 2017 consultation on the Local Plan Review Proposed Submission (incorporating proposed modifications). These documents are available on the Council’s website. A number of comments were received at each stage of the Local Plan Review process; all representations received are available to view in full on the Mid Devon District Council website (as before). Furthermore a summary of representations received is provided for each stage of the Local Plan Review process. The 2015 and 2017 Local Plan Review Proposed Submission (February 2015) Consultation Summary Documents set out responses from Mid Devon District Council to each comment received.

The following table sets out the reasonable alternatives considered through the SA update.

Table 2: Summary of reasonable alternatives considered through the 2017 SA update

<b>Local Plan Policy</b>	<b>Summary of Reasonable Alternative Options considered by SA update (2017)</b>
<b>Strategic Policies</b>	
S2: Amount and distribution of development	<ul style="list-style-type: none"> <li>- Amount of housing: six alternative options for total housing numbers were considered in range 7200 – 8800 over plan period, including the Council’s preferred option of 7860.</li> <li>- Distribution of housing: rural distribution, Tiverton and Crediton focussed alternatives were considered.</li> <li>- Amount of commercial development: higher growth scenario including J27 option.</li> </ul>
S3: Meeting housing needs	<ul style="list-style-type: none"> <li>- 35% affordable housing target.</li> <li>- Remove the requirement to provide 5% of serviced plots for self-build.</li> <li>- Alternatives for the distribution of gypsy and traveller pitches: town focussed urban extensions and rural distribution.</li> </ul>
S4: Ensuring housing delivery	<ul style="list-style-type: none"> <li>- Delete the policy.</li> </ul>
S5: Public open space	<ul style="list-style-type: none"> <li>- Sustainable Urban Drainage Systems (SUDs) to be considered as public open space.</li> <li>- The provision of open space should be applied to towns rather than parishes.</li> </ul>
S6: Employment	<ul style="list-style-type: none"> <li>- Small scale allocations in rural locations.</li> <li>- Allocation for major tourism and leisure.</li> </ul>
S13: Villages	<ul style="list-style-type: none"> <li>- Edge of village development.</li> </ul>
<b>Site Allocations</b>	



TIV1-5: Eastern Urban Extension	- Range of dwellings (1580 – 1830)
TIV12: Phoenix Lane	- Delete policy.
TIV13: Tidcombe Hall	- Delete policy. - 8.4ha with 200 dwellings.
TIV14: Wynnards Mead (Contingency site)	- Delete policy.
OTIV2: Hartnoll Farm	- 1000 dwellings and 20,000sqm employment.
OTIV4: Blundells School (proposed for allocation TIV16)	- Reconsider site in light of EA and HEA evidence: allocate for 200 dwellings.
OTIVNEW: New site at Seven Crosses Hill	- 7.69ha for 184 dwellings.
CU1-CU6: North West Cullompton	- Include education provision as part of the commercial floorspace allocation. - Extend site area, incorporating all 'Growen Farm' land.
CU7-CU12: East Cullompton	- No quantum of green infrastructure and public open space should be specified. - Proposed land swap; 'land at Newland Persey' replaced by 'land at Cooke'. - Land at Aller Barton Farm/ south of Honiton Road, 181ha site.
CU15: Land at Exeter Road	- Reduce allocation to 24 dwellings.
CU17: Week Farm	- Include space for larger retail outlets.
CU18: Venn Farm	- Extend allocation area to 8ha.
CU21: Land at Colebrook (Contingency Site)	- Include full site area proposed at options stage: 19.3ha, 400 dwellings.
OCUNEW: Tiverton Road	- New site proposed for up to 19 dwellings.
CRE6: Sports fields, Exhibition Road	- Alternative to proposed allocation: 2.8ha with 50 dwellings.
CRE10: Land south of A377	- Extension of settlement limit to include all land within 2009 planning permission.
CRE11: Crediton Infrastructure	- Include provision of works to reduce flood risk in policy.
J27: Land at Junction 27	- Proposed allocation of 71 hectares between M5 Junction 27 and Willand for mixed commercial floorspace including a travel hub, agronomy visitor centre, outdoor adventure zone and outlet shopping village.
School Close, Bampton (proposed for allocation BA4)	- Allocate 0.54ha site for 26 dwellings (site omitted in error from 2015 proposed submission)
OCFNEW: Bramble Orchard, Cheriton Fitzpaine	- New alternative site proposed in preference to current plan allocations.
OHANEW: The Pethers	- Site put forward in preference to HA1.
ONENEW: New Estate Site A and B, Newton St Cyres	- New site options (A & B) at Newton St Cyres
OSP1: Higher Town, Sampford Peverell (proposed for allocation SP2)	- Option site reconsidered; proposed allocation of 6ha, 60 dwellings site.
TH1: South of Broadlands, Thorverton	- Proposed extension of site to include allotment land; 1.15 ha, 20 dwellings
OTHNEW: Land north east of Silver Street, Thorverton	- New land submitted for consideration.
OTHNEW: Land to the west of Lynch Close and Cleaves Close, Thorverton	- New land submitted for consideration.
OUF3: Land west of Uffculme,	- 3.5 ha, 60 dwelling site considered for inclusion in

Uffculme	plan following appeal decision (February 2016) granting outline planning permission.
W11: Land east of M5, Willand	- Increase area of proposed allocation; 14.8ha, 174 dwellings
W12: Willand Industrial Estate, Willand	- Full allocation of 9.2ha 22,000sqm of commercial floorspace - Allocate for residential development; 53 dwellings
<b>Development Management Policies</b>	
DM28: Other protected sites	- Include compensatory measures as part of policy

The following table sets out the proposed modifications that have arisen through the SA update.

Table 3: Summary of proposed modifications set out in the 2017 SA update

<b>Local Plan Policy</b>	<b>Summary of Proposed Amendments</b>
<b>Strategic Policies</b>	
S2: Amount and distribution of development	Total housing need over plan period increased to 7860 to meet revised need. Amount of commercial development: higher growth scenario to include Junction 27 allocation.
S3: Meeting housing needs	Increase objectively assessed housing need to 380 per year to reflect SHMA evidence + 260 over plan period for Junction 27 allocation.
S4: Ensuring housing delivery	Increase objectively assessed housing need (as above).
S12: Crediton	Additional criterion for community and education facilities.
S14: Countryside	Remove reference to new traveller sites in open countryside (in response to updated National Policy guidance).
<b>Site Allocations</b>	
TIV1-5: Eastern Urban Extension	Amend policy to give range of dwellings (1580 – 1830).
TIV14: Wynnards Mead (Contingency site)	Proposed for deletion.
OTIV4: Blundells School (proposed for allocation TIV16 Blundells School)	New Policy: New site allocation to meet need arising from J27 employment; reconsidered in light of new Environment Agency (EA) & Historic Environment Appraisal (HEA) evidence.
CU1-CU6: North West Cullompton	Contribution from development towards Town Centre Relief Road/Junction 28 and change in commercial floorspace in line with masterplan. Re-allocation of land to south west of site.
CU7-CU12: East Cullompton	Additional criterion and text in response to HEA.
CU15: Exeter Road	Reduced allocation to 24 dwellings.
CU19: Town Centre Relief Road	Additional criterion and text in response to HEA.
CU20: Cullompton Infrastructure	Additional criterion and text on works to reduce flood risk.
CRE2: Red Hill Cross	Additional supporting text to add context in response to HEA.
CRE3: Cromwells Meadow	Additional criterion and text in response to HEA.
CRE4: Woods Group, Exeter Road	Additional supporting text to add context in response to HEA.
CRE5: Pedlerspool	New primary school included in policy following representation from Devon County Council.
CRE7: Stonewall Lane	Additional supporting text to add context in response to HEA.
CRE10: Land south of A377	Extension of settlement limit to include all land

	included in 2009 Planning Permission. Amendments to supporting text have been made in response to the HEA and latest flood risk information.
CRE11: Crediton Infrastructure	Amend policy to include provision of works to reduce flood risk
J27: Land at Junction 27	New policy: Proposed allocation of 71 ha between M5 Junction 27 and Willand for mixed commercial floorspace, including a travel hub, agronomy visitor centre, outdoor adventure zone and outlet shopping village.
School Close, Bampton (proposed for allocation BA4)	New Policy: 0.54 ha site, 26 dwellings. Site omitted in error from 2015 proposed submission, now included and fully appraised as part of SA.
CH1: Barton, Chawleigh	Additional criterion and text in response to HEA.
CF1: Barnshill Close, Cheriton Fitzpaine	Additional text proposed in response to HEA.
HA1: Land Adjacent Fishers Way, Halberton	Delete reference to archaeological investigation/mitigation following new information from Devon County Archaeology service.
HE1: Depot, Hemyock	Site now won't be available in near future: removed from plan as no longer reasonable alternative.
NE1: Court Orchard, Newton St Cyres	Additional criterion and text in response to HEA.
OSP1: Higher Town, Sampford Peverell (proposed for allocation SP2)	New Policy: 6 ha, 60 dwelling site included in options consultation and 2015 SA; re-considered to meet increased housing need due to J27 employment opportunities, now included as proposed modification.
OUF3: Land west of Uffculme, Uffculme	3.5 ha, 60 dwelling site included as proposed modification following appeal decision February 2016 granting outline planning permission.
WI2: Willand Industrial Estate, Willand	Proposed to allocate full site area; 9.2 ha site for 22,000 square metres commercial floorspace.
<b>Development Management Policies</b>	
DM28: Other protected sites	In response to Environment Agency comments, proposed policy amendment allows for consideration of compensatory measures where mitigation measures are not possible.

**Item 5 - Explain which proposal in the Proposed Submission Local Plan the new policy J27 is considered to relate to.**

*Para 1.20 of the LUC SA Update Review (2018) notes that pages 113-116 in Annex 2 of the SA Update describe the SA work that has been undertaken in relation to the Junction 27 development, as proposed at the September 2016 Full Council meeting. The SA Update refers to this option as being an alternative to the 'Proposed Submission M5 Junction 27 option', and states that the area now proposed for development is smaller in comparison to the Proposed Submission SA option. LUC suggest it should be made clear which proposal in the Proposed Submission Local Plan the new policy J27 is considered to relate to.*

- The Sustainability Appraisal Update (2017) considers a reasonable alternative for a commercial allocation proposal at the M5 Junction J27 for 71 hectares in Annex 2 p.113. The update compares this reasonable alternative to the 'Proposed Submission Sustainability Appraisal option'. The proposal in the Sustainability Appraisal Proposed Submission (2015) option that the Sustainability Update (2017) is referring to is the 'commercial' Junction 27 option. Only one commercial option was appraised in the Sustainability Appraisal Proposed Submission (2015) report and therefore it was considered to be apparent this would be the alternative the option the Sustainability Update was referring to, however, reference could have been clearer by specifically

indicating the comparison was to the to the 96 hectare 'commercial' option previously considered in the Sustainability Appraisal Proposed Submission report (2015). This amendment is proposed to be included in the SA Update.

**Item 6 – Clarify whether SA work for the Junction 27 policy was carried out before the decision was made by Council on 22<sup>nd</sup> September 2016.**

*Para 1.22 of the LUC SA Update Review (2018) queries whether the SA work for the Junction 27 policy was carried out before the decision was made by Council on 22<sup>nd</sup> September 2016 to propose the allocation as an amendment to the Pre-Submission Local Plan.*

10. Set out earlier in this report, a signposting table (table 1) is provided which sets out when and how the environmental report and the results of the consultations were taken into account in 'decision-making'. As noted previously the SA is an iterative, ongoing process and integral to plan making. Table 1 demonstrates how the results of the environmental report and results of the consultation have been taken into account during the process of the Local Plan Review including the findings of the updated SA. The decision made by Council on 22<sup>nd</sup> September 2016 was a recommendation for modifications to the Local Plan Review, but the decision on incorporating the modifications in the Local Plan Review to be published for consultation was undertaken by Cabinet for recommendation to Council on 21<sup>st</sup> November 2016 with Full Council approving the decision on 1<sup>st</sup> December 2016.
11. The reports taken to the meetings held on 21<sup>st</sup> November 2016 and 1<sup>st</sup> December 2016 included reference to the Sustainability Appraisal and the findings of the Sustainability Appraisal process. The report notes that the latest version of the SA was updated to consider the latest available evidence including reasonable alternative proposed through consultation responses. The Sustainability Appraisal Update concludes that the proposals set out in the Local Plan Review together with the schedule of modifications are the most appropriate given the reasonable alternatives available. The report identifies that the Sustainability Appraisal and other updated evidence produced in the process of the plan's preparation will be made available for comment during the Local Plan Review proposed modifications consultation.

**Item 7 – Disaggregation Statement and Justification for the location for the Junction 27 proposal**

*Para 1.24 of the LUC SA Update Review (2018) recommends that additional text be included in the SA Update to evidence why disaggregated options are not considered as reasonable options for the purposes of the SA. It is also recommended that it should be made clear in the SA how the location of the J27 proposal was selected.*

12. The following paragraphs are proposed to be included in the SA Update to evidence why disaggregated options are not considered as reasonable options for the purposes of the SA and how the location of the J27 proposal was selected.

A key principle of retail planning is that main town centre uses should be allocated on the basis of a sequential test (NPPF paragraph 24). Case law in relation to development management decisions establishes that sequential test site selection must relate to *the suitability of a site for the developer's proposal not some alternative (and reduced) scheme which might be suggested by the Planning Authority (or others)*; see *Tesco Stores Ltd v Dundee City Council* [2012] UKSC13. This principle has been upheld in subsequent decisions, such as *Aldergate Properties Ltd and Mansfield DC and Regal Sherwood Oaks* [2016] EWHC1670. The Secretary of State also agreed with his Inspector that there was no requirement to disaggregate a mixed use tourism and retail proposal at "Rushden Lakes, Northamptonshire (APP/G2815/V/12/2190175)". In relation to planning policy and plan making the National Planning Guidance provides that the sequential approach requires a thorough assessment of the suitability, viability and availability of locations for main town centre uses. It requires clearly explained reasoning if more central opportunities to locate main town centre uses are rejected. It states:

- Has the need for main town centre uses been assessed? The assessment should consider the current situation, recent up-take of land for main town centre uses, the supply of and

demand for land for main town centre uses, forecast of future need and the type of land needed for main town centre uses

- Can the identified need for main town centre uses land be accommodated on town centre sites? When identifying sites, the suitability, availability and viability of the site should be considered, with particular regard to the nature of the need that is to be addressed
- If the additional main town centre uses required cannot be accommodated in town centre sites, what are the next sequentially preferable sites that it can be accommodated on? Local Plans should contain policies to apply the sequential test to proposals for main town centre uses that may come forward outside the sites or locations allocated in the Local Plan.

Paragraph: 009 Reference ID: 2b-009-20140306

The Junction 27 policy is for the delivery of a major leisure destination providing mixed use development comprising travel hub, agronomy visitor centre, outdoor adventure zone and outlet shopping village. The retail element is integral to the overall proposal it ensures the development provides a unique multifaceted visitor attraction and assists delivery in terms of viability and the inter-relationship between the elements which is seen as essential.

In terms of Sustainability Appraisal, reasonable alternatives must be of a similar size to accommodate the proposed development i.e. around 71 ha. Apart from a "business as usual" option (i.e. not including a major mixed use tourist/retail proposal), smaller areas cannot be considered as reasonable alternatives as they would be too small to accommodate the proposal without disaggregation. It would not be appropriate to require an SA to consider sites that were ruled out as being suitable sequentially preferable sites.

The Council's Hearing Statement on Junction 27 as well as paragraph 3.184c of the Submitted Local Plan indicates that other areas have been considered. CBRE assessed 6 sites within and close to town centres at, Tiverton, Crediton, Taunton and Exeter and Exmouth. However these sites are too small to accommodate the proposal without disaggregation. The Council commissioned Lichfields to consider additional sites which it did not feel were fully assessed by CBRE. These were Exeter Bus and Coach Station, Tiverton Eastern Urban Extension, North West and East Cullompton. Exeter Bus and Coach Station was too small (3.3 ha ) and would require disaggregation. It also appeared that the site was being promoted for a different type of development to the J27 proposal. Whilst sites within urban extensions were in principle large enough these are subject to other proposals and are not therefore reasonable alternatives to Junction 27 (see paragraph 3.15- 3.19 of the Council's Hearing Statement J27 Issue 3 <https://www.middevon.gov.uk/media/344022/j27-mddc-2-mid-devon-council-issues-2-3-4-8-hearing-statement.pdf>)

The Sustainability Appraisal Update assessed the proposed modifications of the Local Plan Review Proposed Submission, including J27. It notes (p115-117) that: "On the 22nd September 2016 Full Council resolved to propose an allocation of 71 hectares between M5 Junction 27 and Willand for mixed commercial floorspace including a travel hub, agronomy visitor centre, outdoor adventure zone and outlet shopping village. The policy includes transport provision, environmental protection, a comprehensive phasing programme and public master planning exercise. In comparison to the Proposed Submission Sustainability Appraisal option, this commercial option encompasses a smaller site area, a number of the town centre uses have been withdrawn and new information has been provided to determine the retail impact. Taking the policy amendments and new information into account the allocation has been reappraised".

It reappraised the J27 proposal against the Proposed Submission option, which was the rejected 96ha commercial scheme. The 71ha scheme (26% smaller) was found to perform better than the larger alternative. A summary matrix was presented for the Junction 27 option setting out a summary of the comparison between the 96ha site appraised in the Sustainability Appraisal Proposed Submission (2015) report and the 71ha scheme appraised in the Sustainability Appraisal Update (2017), this is reflected below.

### Summary Matrix – OJ27

	Preferred	Alternative
Sustainability Objective	Proposed Modifications Policy 71ha	Proposed Submission Option 96ha
A	-1	-2/?
B	0/?	0/?
C	-1/?	-1/?
D	-2	-3/?
E	+3	+3
F	+3	-3/?
G	0	0
H	+1	+2
I	+2/?	+2/?

The 2015 Sustainability Appraisal supported the Proposed Submission Local Plan Review (2015). This considered a spatial strategy and site allocations that were at the time the Council's preferred option, and as such constitutes an assessment of reasonable alternative strategies which did not incorporate a major tourism/retail proposal. The assessment from page 30 et seq of the SA sets out why sites were preferred and others rejected including options for potential a new community at Cullompton, Hartnoll Farm and J27 Willand which are assessed at page 35 and Appendix 2 p135 onwards.

A site of 96 Ha at J27 is assessed for potential mixed use commercial development in Appendix 2 from p605 onwards and a more extensive urban extension of 104 ha in this location is assessed from p611. Neither of these options were considered sustainable and therefore not at that time included in the Proposed Submission Local Plan Review.

### **Item 8 – Provide a summary of what revised appraisal work was carried out in the SA update**

*Para 1.30 of the LUC SA Update Review (2018) LUC notes that it is currently quite difficult for the reader to quickly understand which site options have been subject to revised SA work within the SA document and why. It was suggested that an additional table would be provided upfront in the SA to summarise this information. This should include a list of alternative options considered and noting for each whether any revised appraisal work was carried out in the SA.*

13. It is suggested that given a list of reasonable alternatives is proposed to be included in table 2 in response to LUC's recommendation following item 4, a further table setting this out again is not required. However it is accepted a summary table to set out why additional SA work was carried could be useful to readers. In response to LUC's recommendation the following table is provided and is suggested to go in the main body of the report.

Table 4 – summary of 2017 SA appraisal work

Policy	Revised SA appraisal work
<b>Strategic Policies</b>	
S2 Amount and distribution of development	<ul style="list-style-type: none"> <li>• Alternative(s) proposed</li> <li>• New information</li> <li>• Comments on the Sustainability Appraisal</li> </ul>

S3 Meeting housing needs	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> <li>New information</li> </ul>
S4 Ensuring housing delivery	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> <li>New information</li> </ul>
S5 Public open space	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> </ul>
S6 Employment	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> </ul>
S10 Tiverton	<ul style="list-style-type: none"> <li>Comment(s) on secondary/ cumulative/ synergistic effects</li> </ul>
S12 Crediton	<ul style="list-style-type: none"> <li>New information</li> </ul>
S13 Villages	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> </ul>
S14 Countryside	<ul style="list-style-type: none"> <li>New information</li> </ul>
<b>Sites</b>	
<b>Tiverton</b>	
TIV1-TIV6 Eastern Urban Extension	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> <li>New information</li> </ul>
TIV7 Town Hall/St Andrew Street	<ul style="list-style-type: none"> <li>New information</li> </ul>
TIV8 Moorhayes Park	<ul style="list-style-type: none"> <li>New information</li> </ul>
TIV12 Phoenix Lane	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> </ul>
TIV13 Tidcombe Hall	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> <li>New information</li> <li>Comment(s) on the Sustainability Appraisal</li> </ul>
TIV14 Wynnards Mead	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> <li>New information</li> </ul>
OTIV2 Hartnoll Farm	<ul style="list-style-type: none"> <li>Comment on secondary/ cumulative/ synergistic effects</li> <li>Alternative(s) proposed</li> </ul>
OTIV4 Blundells School (Proposed for allocation TIV16)	<ul style="list-style-type: none"> <li>New information</li> <li>Comment(s) on the Sustainability Appraisal</li> </ul>
OTIV13 Exeter Hill	<ul style="list-style-type: none"> <li>Comment(s) on the Sustainability Appraisal</li> </ul>
OTIVNEW New site land at Seven Crosses Hill	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> </ul>
<b>Cullompton</b>	
CU1-CU6 North West Cullompton	<ul style="list-style-type: none"> <li>Comment(s) on secondary/ cumulative/ synergistic effects</li> <li>Alternative(s) proposed</li> <li>New information</li> <li>Comment(s) on the Sustainability Appraisal</li> </ul>
CU7-CU12 East Cullompton	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> <li>New information</li> <li>Comment(s) on the Sustainability Appraisal</li> </ul>
CU13 Knowle Lane	<ul style="list-style-type: none"> <li>Comment on secondary/ cumulative/ synergistic effects</li> <li>Comment(s) on the Sustainability Appraisal</li> </ul>
CU14 Ware Park and Footlands	<ul style="list-style-type: none"> <li>Comment(s) on secondary/ cumulative/ synergistic effects</li> <li>New information</li> <li>Comment(s) on the Sustainability Appraisal</li> </ul>
CU15 Land at Exeter Road	<ul style="list-style-type: none"> <li>Comment(s) on secondary/ cumulative/ synergistic effects</li> <li>New information</li> <li>Comment(s) on the Sustainability Appraisal</li> </ul>
CU16 Cummings Nursery	<ul style="list-style-type: none"> <li>Comment(s) on secondary/ cumulative/ synergistic effects</li> <li>Comment(s) on the Sustainability Appraisal</li> </ul>
CU17 Week Farm	<ul style="list-style-type: none"> <li>Comment(s) on secondary/ cumulative/ synergistic effects</li> <li>Alternative(s) proposed</li> </ul>
CU18 Venn Farm	<ul style="list-style-type: none"> <li>Comment(s) on secondary/ cumulative/ synergistic effects</li> <li>Alternative(s) proposed</li> </ul>
CU19 Town Centre Relief Road	<ul style="list-style-type: none"> <li>New information</li> </ul>
CU20 Cullompton Infrastructure	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> </ul>

OCUNEW Tiverton Road	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> </ul>
CU21 Land at Colebrook CONTINGENCY SITE	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> <li>Comment(s) on the Sustainability Appraisal</li> </ul>
<b>Crediton</b>	
CRE1 Wellparks	<ul style="list-style-type: none"> <li>New information</li> </ul>
CRE2 Red Hill Cross, Exhibition Road	<ul style="list-style-type: none"> <li>New information</li> </ul>
CRE3 Cromwells Meadow	<ul style="list-style-type: none"> <li>New information</li> </ul>
CRE4 Woods Group, Exeter Road	<ul style="list-style-type: none"> <li>New information</li> </ul>
CRE5 Pedlerspool	<ul style="list-style-type: none"> <li>Comment(s) on secondary/ cumulative/ synergistic effects</li> <li>Alternative(s) proposed</li> <li>New information</li> <li>Comment(s) on the Sustainability Appraisal</li> </ul>
CRE6 Sports fields, Exhibition Road	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> <li>New information</li> </ul>
CRE7 Stonewall Lane	<ul style="list-style-type: none"> <li>Comment(s) on secondary/ cumulative/ synergistic effects</li> <li>New information</li> </ul>
CRE9 Alexandra Close	<ul style="list-style-type: none"> <li>Comment(s) on the Sustainability Appraisal</li> </ul>
CRE10 Land south of A377	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> <li>New information</li> </ul>
CRE11 Crediton Infrastructure	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> </ul>
Options to the West of Crediton – OCRE10 Westwood Farm and OCRE11 Land at Chapel Down Farm	<ul style="list-style-type: none"> <li>Comment(s) on the Sustainability Appraisal</li> </ul>
<b>Junction 27</b>	
Land at Junction 27	<ul style="list-style-type: none"> <li>Comment(s) on secondary/ cumulative/ synergistic effects</li> <li>Alternative(s) proposed</li> <li>New information</li> <li>Comment(s) on the Sustainability Appraisal</li> </ul>
<b>Rural areas</b>	
BA1 Newton Square, Bampton	<ul style="list-style-type: none"> <li>New information</li> </ul>
School Close, Bampton (proposed for allocation BA4)	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> </ul>
BO1 Land adjacent to Hollywell, Bow	<ul style="list-style-type: none"> <li>New information</li> </ul>
BO2, West of Godfrey's Gardens, Bow	<ul style="list-style-type: none"> <li>New information</li> </ul>
BR1 Hele Road, Bradninch	<ul style="list-style-type: none"> <li>New information</li> </ul>
CH1 Barton, Chawleigh	<ul style="list-style-type: none"> <li>New information</li> </ul>
CB1 Land off Church Lane, Cheriton Bishop	<ul style="list-style-type: none"> <li>New information</li> </ul>
CF1 Barnshill Close, Cheriton Fitzpaine	<ul style="list-style-type: none"> <li>New information</li> </ul>
CF2 Land adjacent school, Cheriton Fitzpaine	<ul style="list-style-type: none"> <li>New information</li> <li>Comments on the Sustainability Appraisal</li> </ul>
OCF2 Landboat Farm, Cheriton Fitzpaine	<ul style="list-style-type: none"> <li>Comment(s) on the Sustainability Appraisal</li> </ul>
OCFNEW Bramble Orchard, Cheriton Fitzpaine	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> </ul>
HA1 Land adjacent Fishers Way, Halberton	<ul style="list-style-type: none"> <li>New information</li> </ul>
OHA1 Land at Blundells Road, Halberton	<ul style="list-style-type: none"> <li>Comment(s) on the Sustainability Appraisal</li> </ul>
OHANEW The Pethers, Halberton	<ul style="list-style-type: none"> <li>Comment(s) on the Sustainability Appraisal</li> </ul>
HE1 Depot, Hemyock	<ul style="list-style-type: none"> <li>New information</li> </ul>
NE1 Court Orchard, Newton St Cyres	<ul style="list-style-type: none"> <li>New information</li> </ul>
ONENEW New Estate Site A, Newton St Cyres	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> </ul>
ONENEW New Estate Site B, Newton St Cyres	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> </ul>
OSP1 Higher Town, Sampford Peverell (Proposed for allocation SP2)	<ul style="list-style-type: none"> <li>Alternative(s) proposed</li> <li>New information</li> </ul>
SA1 Fanny's Lane, Sandford	<ul style="list-style-type: none"> <li>New information</li> </ul>
SI1 Land at Old Butterleigh Road, Silverton	<ul style="list-style-type: none"> <li>New information</li> </ul>



SI2 The Garage, Silverton	<ul style="list-style-type: none"> <li>• New information</li> </ul>
TH1 South of Broadlands, Thorverton	<ul style="list-style-type: none"> <li>• Alternative(s) proposed</li> </ul>
OTHNEW Land north east of Silver Street, Thorverton	<ul style="list-style-type: none"> <li>• Alternative(s) proposed</li> </ul>
OTHNEW Land to the west of Lynch Close and Cleaves Close, Thorverton	<ul style="list-style-type: none"> <li>• Alternative(s) proposed</li> </ul>
OUF3 Land West of Uffculme	<ul style="list-style-type: none"> <li>• Alternative(s) proposed</li> <li>• Comments on the Sustainability Appraisal</li> </ul>
WI1 Land east of M5, Willand	<ul style="list-style-type: none"> <li>• Alternative(s) proposed</li> </ul>
WI2 Willand Industrial Estate	<ul style="list-style-type: none"> <li>• Alternative(s) proposed</li> <li>• New information</li> </ul>
<b>Development Management Policies</b>	
DM28 Other protected sites	<ul style="list-style-type: none"> <li>• Alternative(s) proposed</li> </ul>

**Item 9 – Confirmation that Cullompton is not appropriate for consideration as a reasonable option for additional housing associated with Junction 27**

*Para 1.34 of the LUC SA Update Review (2018) recommends that the Council will need to satisfy itself that site options at Cullompton can not be considered to be reasonable options due to the deliverability issue set out in the Implications Report presented at Cabinet 15<sup>th</sup> September and full Council 22<sup>nd</sup> September 2016, or for other reasons. Should this not be the case, it may be necessary to consider site options at Cullompton further through the SA for the delivery of the additional housing.*

14. Cullompton is the main focus of growth during the plan period; a significant amount of development is already programmed for Cullompton during this period. Analysis which forms part of the Local Plan Review Evidence base considers the level of infrastructure improvements, in particular strategic highways works, which would need to be delivered to accommodate the proposed level of growth. The required infrastructure improvements will be delivered in line with the phased delivery of the key strategic housing allocations planned for Cullompton. Any additional development on top of the current Local Plan allocations would therefore not be appropriate until longer-term strategic highways improvements have been delivered. Cullompton is therefore not considered as a reasonably appropriate location to meet this extra level of need.

**Item 10 –Work undertaken to date should be collated and used to inform a review of the decision making process regarding which sites to allocate in relation to the Junction 27 proposal.**

*Para 1.37 and 1.38 of the LUC SA Update Review (2018) note that it was not clear if a methodical process of revisiting the list of rejected site options, in light of any updated SA findings, was undertaken to consider their appropriateness. The SA Update does not report on why the two sites chosen were selected over other options. The additional work required, is therefore not necessarily new appraisal work in relation to alternative options to TIV16 and SP2, but work undertaken to date should be collated and used to inform a review of the decision making process regarding which sites to allocate. A clear audit trail listing all of the housing site options and stating which are reasonable options for allocation as additional housing sites and justification for the selection or rejection of each option should be provided.*

15. A request by members was made in 2016 for a J27 implications Report which looked at the implications if members were minded to allocate J27 as part of the Local Plan Review Proposed Submission. This report was taken to Cabinet on the 15<sup>th</sup> September 2016 and Council on 22<sup>nd</sup> September 2016 which set out the history of the J27 proposal and decisions previously made by members and the implications of allocating J27. The report also identified that if members were minded to make a modification to the plan to allocate land at J27, sites for an additional 260 dwellings will also need to be allocated in the Local Plan. Alternative housing option sites were set out to members based on a selection criteria as follows: sites previously consulted on as part of the Local Plan Review Options consultation (January 2014) or received as a local plan representation; sites considered by the Strategic Housing Land Availability Assessment Panel; compliance with the Local Plan Review Distribution Strategy; and proximate to the development proposal at Junction 27.

16. Individual sites were considered at an officer level where they met the selection criteria. These were then presented to members at Cabinet on 15<sup>th</sup> September and Council on the 22<sup>nd</sup> September 2016 in a collated format. Not all sites or all village locations that were considered at an officer level were referred to in the committee paperwork on the 15<sup>th</sup> or 22<sup>nd</sup> September 2016. However the reasons for rejecting site option set out in the Implications Report and the Sustainability Appraisal (2015) are broadly the same. The 2015 SA was publically available at the time the Implications Report was presented to members in 2016 and the draft 2015 SA was presented to members previously in the 2014 Cabinet (27 November, 4 December, 11 December) and Council meetings (17 December 2014).
17. Following the recommendations undertaken on the 15<sup>th</sup> and 22<sup>nd</sup> September, a report was presented to Cabinet on 21<sup>st</sup> November 2016 and full Council 1<sup>st</sup> December 2017 which sought approval for publication of the Local Plan Review including main modifications and supporting evidence. This report makes reference to the Sustainability Appraisal Update and that the Planning Policy Advisory Group which considered all paperwork accompanying the report and provided their recommendations to the 15<sup>th</sup> September Cabinet. The report summarises the considerations of the group and recommendations.
18. In response to the recommendations of LUC the tables below are provided. As set out in LUC's initial review of the Sustainability Appraisal update sites with planning permission or which are already proposed for allocation are not considered as reasonable alternatives for the additional dwellings.

Table 5: Summary site option areas

Site option area	Reason
Cullompton	Cullompton is the main focus of growth during the plan period; a significant amount of development is already programmed for Cullompton during this period. Analysis which forms part of the Local Plan Review Evidence base considers the level of infrastructure improvements, in particular strategic highways works, which would need to be delivered to accommodate the proposed level of growth. The required infrastructure improvements will be delivered in line with the phased delivery of the key strategic housing allocations planned for Cullompton. Any additional development on top of the current Local Plan allocations would therefore not be appropriate until longer-term strategic highways improvements have been delivered. Cullompton is therefore not considered as a reasonably appropriate location to meet this extra level of need.
Crediton	Crediton is not well related to the proposal at Junction 27 and is therefore not an area considered for additional residential development to meet this need.
Tiverton	Tiverton is considered as a site option area to consider reasonable alternatives for additional residential development to meet this need.
Villages proximate <sup>1</sup> to J27	<ul style="list-style-type: none"> <li>• Culmstock</li> <li>• Halberton</li> <li>• Hemyock</li> <li>• Holcombe Rogus</li> <li>• Kentisbeare</li> <li>• Sampford Peverell</li> <li>• Uffculme</li> <li>• Willand</li> </ul>
Villages proximate to J27 and referred to in committee paperwork on 22 <sup>nd</sup> September 2016	<ul style="list-style-type: none"> <li>• Hemyock</li> <li>• Kentisbeare</li> <li>• Sampford Peverell</li> <li>• Uffculme</li> </ul>

<sup>1</sup> Proximate is considered to be: 30 minutes of J27 by walking, cycling or public transport

Site option area	Reason
	<ul style="list-style-type: none"> <li>Willand</li> </ul>
Villages not proximate to J27	<p>The following villages were not considered as proximate to J27 and therefore were not to be considered as reasonable alternatives for additional residential development to meet this need:</p> <ul style="list-style-type: none"> <li>Bampton</li> <li>Bow</li> <li>Bradninch</li> <li>Chawleigh</li> <li>Cheriton Bishop</li> <li>Cheriton Fitzpaine</li> <li>Copplestone</li> <li>Lapford</li> <li>Morchard Bishop</li> <li>Newton St Cyres</li> <li>Sandford</li> <li>Silverton</li> <li>Thorverton</li> <li>Yeoford</li> </ul>
Areas not consistent with the proposed Local Plan Review distribution strategy	<p>The following areas were not considered as consistent with the proposed Local Plan Review distribution strategy as they are not defined as villages in S13 and therefore were not considered as reasonable alternatives for additional residential development to meet this need:</p> <ul style="list-style-type: none"> <li>Bickleigh</li> <li>Butterleigh</li> <li>Burlescombe</li> <li>Colebrooke</li> <li>Oakford</li> <li>Shillingford</li> </ul>

Table 6 – Site options which meet the selection criteria as set out in the Implications Report

Site options considered during the SA process for the Local Plan Review	Reasonable alternative option for additional site allocations?	Location of site appraisal matrix	Reason for selecting/rejecting option for additional housing allocation
<b>Sites at Tiverton</b>			
Hay Park	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<b>Rejected:</b> This option 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.
Blundells School	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 –	<b>Selected:</b> The site is proposed to be taken forward as an allocation and addressed in the Sustainability Update through policy TIV16. The site was considered as part of the J27 Implications Report presented to Cabinet 15 <sup>th</sup> September 2016 and Full Council 22 <sup>nd</sup> September 2016. It was

Site options considered during the SA process for the Local Plan Review	Reasonable alternative option for additional site allocations?	Location of site appraisal matrix	Reason for selecting/rejecting option for additional housing allocation
		Appendix 2	noted at this time that the site is currently allocated in the adopted Local Plan for 200 dwellings and was due to be deleted in the Local Plan Review as the site had not come forward. However officers now understand that the land is available and developable. The site is significantly a brownfield site which is accessible from Tiverton town centre. Development of the site provides the opportunity for remodelling of the site to reduce flood risk downstream. Whilst it is located further from J27 than some other assessed sites, it is on a bus route that serves both the Tiverton town centre and J27, and the sites otherwise sustainable location is considered to outweigh the issue of distance from J27.
Leat Street	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<b>Rejected:</b> In the Sustainability Appraisal Proposed Submission Report (2015) it is noted in Chapter 4 'Reasons for selecting/rejecting policy alternatives' that this option had 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 proportion of the site is also located in flood zone 2 and even with mitigation measures there would remain flooding concerns.
The Avenue	Uncertain	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<b>Rejected:</b> 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. It is also noted that the site is located within the settlement boundary and can come forward as a windfall allocation. The site is potentially a reasonable alternative, but uncertainty over deliverability means that it is rejected as an allocation.
Exeter Hill	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February	<b>Rejected:</b> The site 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

Site options considered during the SA process for the Local Plan Review	Reasonable alternative option for additional site allocations?	Location of site appraisal matrix	Reason for selecting/rejecting option for additional housing allocation
		2015 – Appendix 2 The SA Update in 2017 also included a revised appraisal of this site to take into account a consultation comment received.	landscape. It was rejected as an option for the additional housing allocation as the site would be more intrusive than other allocations.
Land at Bampton Street/William Street Car Park (mixed use)	Uncertain	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<b>Rejected:</b> Although in sustainability terms the sites regeneration would be positive, the SCLAA panel has raised deliverability concerns. Whilst the site may be a reasonable alternative, however it is in different ownerships, which is not being actively promoted. The uncertainty over deliverability resulted in its rejection. However it is a town centre site and could be developed as a windfall site, should a proposal come forward.
Hartnoll Farm (considered for both housing or mixed use)	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2 The Sustainability Appraisal Update (2017) included revised appraisal work to consider the site as a revised mixed use allocation.	<b>Rejected:</b> The full site area would extend Tiverton to the East substantially on the valley floor which would significantly close the gap between urban areas and nearby villages, especially Halberton. It would also 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 grade 1 land 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. The Sustainability Appraisal Update (2017) included revised appraisal work to consider the site as a revised mixed use allocation which was proposed through the Sustainability Appraisal (2015) consultation. It was rejected as an option given the issues around the protection and promotion of a quality built and historic environment in which

Site options considered during the SA process for the Local Plan Review	Reasonable alternative option for additional site allocations?	Location of site appraisal matrix	Reason for selecting/rejecting option for additional housing allocation
			<p>the coalescence of Tiverton and the village of Halberton which has its own separate identity cannot be mitigated. The site was considered as part of the J27 Implications Report presented to Cabinet 15<sup>th</sup> September 2016 and Full Council 22<sup>nd</sup> September 2016, options presented included an addition of 480 dwellings which could be provided within the existing planned for infrastructure constraints recognised in the existing adopted Local Plan site Tiverton Eastern Urban Extension. The report notes that if the Tiverton Eastern Urban Extension site which is currently allocated in the Local Plan was to be extended to allow for the additional housing it would be logical for this to include land at Hartnoll Farm which abuts the current urban extension. The full extent of the Hartnoll Farm site (70ha) was considered as part of the Local Plan Review Options Consultation (2014) and Sustainability Appraisal Proposed Submission Report (2015). The implications report noted that if only part of this site was needed it would be sensible for this to comprise the western and southern parts of the site which are predominantly Grade 3 agricultural land and are well screened from wider views. This would allow for the areas adjoining the Grand Western Canal to be left undeveloped whilst also maintaining the strategic green gap between the edge of Tiverton and Halberton village which was identified as one of the key reasons for rejection in the Sustainability Appraisal Proposed Submission report (2015). The Implications Report notes that a new access, or reconfiguration of the current Hartnoll Farm/employment land access arrangements, would be needed to allow development to occur independently of the development of the current eastern urban extension. The report recommends that if members were minded to allocate some land at the Hartnoll Farm an option 200 dwellings should be</p>

Site options considered during the SA process for the Local Plan Review	Reasonable alternative option for additional site allocations?	Location of site appraisal matrix	Reason for selecting/rejecting option for additional housing allocation
			proposed to allow flexibility for the further refinement of densities at the Tiverton Eastern Urban Extension should this be necessary. This site was not preferred at the Full Council meeting on 22 <sup>nd</sup> September 2016 and therefore not taken forward as a proposed allocation for the additional dwellings.
Land at Seven Crosses Hill	No	The Sustainability Appraisal Update (2017) included appraisal work to consider the site.	<b>Rejected:</b> This site came forward during the consultation on the Local Plan Review Proposed Submission (2015) but it was rejected as a housing allocation as there were a number of constraints to the site including topography and highways access. The site is to the south west of Tiverton and is steeply sloping. It is 7.69 ha and would therefore be too large to meet the identified need.
<b>Sites at the Villages</b>			
Culmstock Glebe and Rackfields, Culmstock	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<b>Rejected:</b> The two sites ‘Glebe and Rackfields’ and ‘The Croft’ in Culmstock were not preferred as they were 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 focussed around All Saints Church. There is greater potential for the impact on the conservation area should either of these sites be developed which can be avoided by selecting others. In addition these two sites in the village received the greatest level of objection of all the village’s sites during the Options consultation.
The Croft, Culmstock	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<b>Rejected:</b> The two sites ‘Glebe and Rackfields’ and ‘The Croft’ in Culmstock were not preferred as they were 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 focussed around All Saints Church. There is greater potential for the impact on the conservation area should either of these sites be developed which can be avoided by selecting others. In

Site options considered during the SA process for the Local Plan Review	Reasonable alternative option for additional site allocations?	Location of site appraisal matrix	Reason for selecting/rejecting option for additional housing allocation
			addition these two sites in the village received the greatest level of objection of all the village's sites during the Options consultation.
Land at Blundells Road, Halberton	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<b>Rejected:</b> The site is within the conservation area with the potential for negative impacts which can be avoided by allocated other sites. Land at Blundells Road was also not favoured by the Parish Council. The Sustainability Appraisal Update (2017) refers to a number of consultation comments relating to this site but no changes have been made to the SA work undertaken previously and it remains rejected as a site option.
New Site: The Pethers, Halberton	Yes No	This site came forward during the consultation on the Local Plan Review Proposed Submission (2015). The Sustainability Appraisal Update (2017) included appraisal work to consider the site.	<b>Rejected:</b> The site is rejected as a preferred site. The site was put forward as an alternative to Policy HA1 in Halberton with a capacity of up to 10 dwellings in 2015. It has outline permission (17/0019/OUT) for 5 dwellings. It is therefore too small to be a reasonable alternative for additional site allocation to meet the need for J27.
Land South West of Conigar Close, Hemyock	No	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	The site now has planning permission (17/00746/MARM for 22 dwellings 23/08/2017) so is no longer a reasonable option for meeting the additional housing need, but will instead be part of the general local plan requirement.
Culmbridge Farm, Hemyock	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<b>Rejected:</b> The four alternative sites presented in Hemyock are all greenfield sites within the location of the Blackdown Hills AONB and the impact on the special qualities of the landscape designation is a factor to consider. The four greenfield sites all have the potential for some landscape and visual impact in the context of the Blackdown Hills AONB and therefore



Site options considered during the SA process for the Local Plan Review	Reasonable alternative option for additional site allocations?	Location of site appraisal matrix	Reason for selecting/rejecting option for additional housing allocation
			are not preferred. The site was considered as part of the J27 Implications Report presented to Cabinet 15 <sup>th</sup> September 2016 and Full Council 22 <sup>nd</sup> September 2016. It was noted that sites in Hemyock were not favoured owing to their scale and impact on the Area of Outstanding Natural Beauty.
Land north of Culmbridge Farm, Hemyock	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<b>Rejected:</b> The four alternative sites presented in Hemyock are all greenfield sites within the location of the Blackdown Hills AONB and the impact on the special qualities of the landscape designation is a factor to consider. The four greenfield sites all have the potential for some landscape and visual impact in the context of the Blackdown Hills AONB and therefore are not preferred. The site was considered as part of the J27 Implications Report presented to Cabinet 15 <sup>th</sup> September 2016 and Full Council 22 <sup>nd</sup> September 2016. It was noted that sites in Hemyock were not favoured owing to their scale and impact on the Area of Outstanding Natural Beauty.
Land adj. cemetery, Hemyock	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<b>Rejected:</b> The four alternative sites presented in Hemyock are all greenfield sites within the location of the Blackdown Hills AONB and the impact on the special qualities of the landscape designation is a factor to consider. The four greenfield sites all have the potential for some landscape and visual impact in the context of the Blackdown Hills AONB and therefore are not preferred. The site was considered as part of the J27 Implications Report presented to Cabinet 15 <sup>th</sup> September 2016 and Full Council 22 <sup>nd</sup> September 2016. It was noted that sites in Hemyock were not favoured owing to their scale and impact on the Area of Outstanding Natural Beauty.
Land by Kentisbeare Village Hall, Kentisbeare	Yes	SA Report for the Local Plan Review (Proposed	<b>Rejected:</b> This site received a number of objections during the Options Consultation. Although it is an existing allocation, it has not come forward

Site options considered during the SA process for the Local Plan Review	Reasonable alternative option for additional site allocations?	Location of site appraisal matrix	Reason for selecting/rejecting option for additional housing allocation
(mixed use)		Submission consultation) February 2015 – Appendix 2	since being allocated in 2010, for these reasons it is not proposed to be retained in the Local Plan Review. The site was considered as part of the J27 Implications Report presented to Cabinet 15 <sup>th</sup> September 2016 and Full Council 22 <sup>nd</sup> September 2016. It was noted that land was previously included in the Local Plan at Kentisbeare next to the Village Hall as an affordable housing allocation for 20 dwellings. This was removed owing to a lack of impetus in the site coming forward for affordable housing and due to strong objection from the Parish Council. However if allocated for a mix of market and affordable housing it is considered that it would come forward for development. This site was not supported by the Planning Policy Advisory Group and was not preferred.
Higher Town, Sampford Peverell	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<b>Selected:</b> In the Sustainability Appraisal Proposed Submission Report (2015) it is noted in Chapter 4 'Reasons for selecting/rejecting policy alternatives' it is stated that this option was not preferred because it had the potential for greater landscape or visual impacts. As set out in the Sustainability Appraisal Update (2017), criteria have now been included in the policy to ensure landscaping and design respects the setting and character of the area, conservation area and listed building. The site is proposed to be taken forward as an additional allocation and addressed in the Sustainability Appraisal Update (2017) through policy SP2. The site was considered as part of the J27 Implications Report presented to Cabinet 15 <sup>th</sup> September 2016 and Full Council 22 <sup>nd</sup> September 2016. It was noted at this time that Land at Higher Town could provide 60 dwellings. The site is elevated and would require careful landscaping and mitigation measures. The development is proportionate to the scale of the existing village. The Highway Authority has previously

Site options considered during the SA process for the Local Plan Review	Reasonable alternative option for additional site allocations?	Location of site appraisal matrix	Reason for selecting/rejecting option for additional housing allocation
			<p>advised that any development of the site should be phased until after improved access to the A361.</p> <p>The J27 Implications Report presented to Cabinet 15<sup>th</sup> September 2016 and Full Council 22<sup>nd</sup> September 2016 noted that other potential sites in Sampford Peverell were not considered to be of an appropriate scale or would impact adversely on heritage assets.</p> <p>Several of the sites in Sampford Peverell are reasonable alternatives, and have similar landscape or heritage characteristics. They have an advantage of being slightly closer to J27 than Higher Town. However, they are part of more extensive tracts of land, and their allocation would result in larger housing sites than the identified additional need for 60 dwellings. It would not be realistic to seek to artificially subdivide sites to limit the number of units that are developed. As such, development of a number of potentially suitable sites in Sampford Peverell would result in much more significant expansion of the village This would be contrary to the spatial strategy in Policy SP2 of the Local Plan Review, which concentrates development in the three main towns and has limited development in other settlements aimed at meeting local needs and promoting vibrant communities.</p> <p>Conversely SP2 is a naturally enclosed site, bounded by hedgerows and road, and its development would be of a scale acceptable within the parameters of Policy S2 and local infrastructure constraints. The location of the site on the west of the village is considered to be only a minor disadvantage compared to the other sites in the village.</p> <p>The site is being actively promoted and is deliverable.</p>
Land off Whitnage Road,	Yes	SA Report for the Local Plan Review	<b>Rejected:</b> This option is located adjacent to the A361, sharing a long boundary with this busy road. Such a

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Sampford Peverell		(Proposed Submission consultation) February 2015 – Appendix 2	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. The J27 Implications Report presented to Cabinet 15 <sup>th</sup> September 2016 and Full Council 22 <sup>nd</sup> September 2016 noted that other potential sites in Sampford Peverell were not considered to be of an appropriate scale or would impact adversely on heritage assets.
Land at Mountain Oak Farm, Sampford Peverell	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<b>Rejected:</b> This option is a large site slightly divorced from the main body of the village, and does not offer the most logical extension to the built extent. The J27 Implications Report presented to Cabinet 15 <sup>th</sup> September 2016 and Full Council 22 <sup>nd</sup> September 2016 noted that other potential sites in Sampford Peverell were not considered to be of an appropriate scale or would impact adversely on heritage assets. See above under the rationale for selecting Higher Town.
Morrells Farm, Sampford Peverell (SHLAA site 6)	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<b>Rejected:</b> This option is a very large site which has a poor spatial relation with the village, it is out of scale with the settlement and divorced from the main built extent of Sampford Peverell. Although 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. The J27 Implications Report presented to Cabinet 15 <sup>th</sup> September 2016 and Full Council 22 <sup>nd</sup> September 2016 noted that other potential sites in Sampford Peverell were not considered to be of an appropriate scale or would impact adversely on heritage assets. See above under the rationale for selecting Higher Town.
Morrells Farm adj. the main road, Sampford	Yes	SA Report for the Local Plan Review	<b>Rejected:</b> This option would likely have an impact on the Grade II farmhouse, and would have a

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Peverell (SHLAA site 3&4)		(Proposed Submission consultation) February 2015 – Appendix 2	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). The J27 Implications Report presented to Cabinet 15 <sup>th</sup> September 2016 and Full Council 22 <sup>nd</sup> September 2016 noted that other potential sites in Sampford Peverell were not considered to be of an appropriate scale or would impact adversely on heritage assets. See above under the rationale for selecting Higher Town.
Land adjoining Poynings, Uffculme	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<b>Rejected:</b> This option 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 determined the decision not to allocate this site. The J27 Implications Report presented to Cabinet 15 <sup>th</sup> September 2016 and Full Council 22 <sup>nd</sup> September 2016 noted that sites in Uffculme were considered, however were not proposed as allocations for the additional housing as the sites were not deemed to be appropriate extensions to the village, had access difficulties and some were in Minerals Safeguarding Areas.
Land adjacent Sunnydene, Uffculme	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<b>Rejected:</b> This option is located at the edge of the settlement where the nearest dwellings are very low density and is accessed off the narrow Clay Lane. Although technically deliverable, the nature of the location of the site at some distance along the single carriageway lane is considered sufficient basis not to allocate. The J27 Implications Report presented to Cabinet 15 <sup>th</sup> September 2016 and Full Council 22 <sup>nd</sup> September 2016 noted that sites in Uffculme were considered, however were not

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			proposed as allocations for the additional housing as the sites were not deemed to be appropriate extensions to the village, had access difficulties and some were in Minerals Safeguarding Areas.
Land off Chapel Hill, Uffculme	No	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	This option has been confirmed as unavailable since the inclusion in the Local Plan Review Options Consultation (2014). Therefore this site is not a reasonable alternative to consider.
Land off Ashley Road, Uffculme	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<b>Rejected:</b> This option has planning permission on the southern extent and the northern extent is within the Hillhead Quarry Consultation Zone. The northern extent is also elevated in comparison with the adjacent housing to the east which could result in overlooking. For these reasons, the site is not preferred. The J27 Implications Report presented to Cabinet 15 <sup>th</sup> September 2016 and Full Council 22 <sup>nd</sup> September 2016 noted that sites in Uffculme were considered, however were not proposed as allocations for the additional housing as the sites were not deemed to be appropriate extensions to the village, had access difficulties and some were in Minerals Safeguarding Areas.
Land west of Uffculme, Uffculme	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	The development of this site would extend the pattern of the village in a linear fashion along the B3440. It would also 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. Further to a subsequent appeal decision and alternative inspector's comments, the majority option site area now has planning permission. The area with

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			<p>planning permission is now included in the Local Plan Review to reflect the decision at appeal. The option is therefore no longer reasonable.</p> <p>The J27 Implications Report presented to Cabinet 15<sup>th</sup> September 2016 and Full Council 22<sup>nd</sup> September 2016 noted that sites in Uffculme were considered, however were not proposed as allocations for the additional housing as the sites were not deemed to be appropriate extensions to the village, had access difficulties and some were in Minerals Safeguarding Areas.</p>
Quicks Farm, Willand	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<p><b>Rejected:</b> Although the site scores favourably in the SA, it received the greatest level of objection of all sites in the village during the Options consultation and therefore was not preferred at the time. The J27 Implications Report presented to Cabinet 15<sup>th</sup> September 2016 and Full Council 22<sup>nd</sup> September 2016 noted that sites in Willand were considered. Although there were developable sites in the village, sites in Willand were not recommended as Devon County Council had advised that development of these sites would exacerbate traffic problems prior to planned future improvements.</p>
Dean Hill Road, Willand	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<p><b>Rejected:</b> The site is divorced from the main body of Willand by the motorway. The J27 Implications Report presented to Cabinet 15<sup>th</sup> September 2016 and Full Council 22<sup>nd</sup> September 2016 noted that sites in Willand were considered. Although there were developable sites in the village, sites in Willand were not recommended as Devon County Council had advised that development of these sites would exacerbate traffic problems prior to planned future improvements.</p>
Land NE of Four Crosses Roundabout, Willand	Yes	SA Report for the Local Plan Review (Proposed Submission consultation)	<p><b>Rejected:</b> The site is very large which would expand the village beyond the boundary currently delineated by the busy roads of the B3181 and B3440. The J27 Implications Report presented to Cabinet 15<sup>th</sup> September 2016 and</p>

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		February 2015 – Appendix 2	Full Council 22 <sup>nd</sup> September 2016 noted that sites in Willand were considered. Although there were developable sites in the village, sites in Willand were not recommended as Devon County Council had advised that development of these sites would exacerbate traffic problems prior to planned future improvements.
Lloyd Maunder Way, Willand	Yes	SA Report for the Local Plan Review (Proposed Submission consultation) February 2015 – Appendix 2	<b>Rejected:</b> The site is divorced from the main body of Willand by the motorway. The J27 Implications Report presented to Cabinet 15 <sup>th</sup> September 2016 and Full Council 22 <sup>nd</sup> September 2016 noted that sites in Willand were considered. Although there were developable sites in the village, sites in Willand were not recommended as Devon County Council had advised that development of these sites would exacerbate traffic problems prior to planned future improvements.

**Item 11 – Further work may need to be undertaken to collate the information that the Council holds about the options assessment process to be presented in the SA Update.**

*Para 1.40 of the LUC SA Update Review (2018) notes that without a clear audit trail of policy options and decision making in relation to each policy topic/proposed modification which does not currently appear in the SA Update, it is very difficult to establish whether the process has been completed robustly and whether there is a need to assess reasonable alternatives to other modifications in the Plan. It is suggested that further work may need to be undertaken to collate the information that the Council holds about the options assessment process, to be presented in the SA Update.*

19. Sites presented in the Local Plan Review Options Consultation (2014) included all housing and commercial options available at the time deemed to be deliverable across the District and were appraised in the Sustainability Appraisal Interim Report (2014). Following from this consultation the Local Plan Review Proposed Submission (2015) presented the preferred policy options. Alongside this the Sustainability Appraisal Proposed Submission (2015) was published, which set out all of the alternatives deemed to be deliverable across the District at the time, including additional options submitted as part of the Local Plan Review Options Consultation (2014). Site options that were submitted but were considered undeliverable were set out in Appendix 3: Undeliverable site options in the Sustainability Appraisal Proposed Submission (2015). The Sustainability Appraisal Update (2017) was undertaken to take into account comments made at the 2015 Proposed Submission Stage consultation and proposed modifications to the Local Plan Review as set out in the introduction of the update. Annex 2 of the update identifies and considers reasonable alternatives which have arisen from representations and/or new information. Full additional reasonable alternative appraisals were presented in Annex 3 where deemed necessary.



20. All previous iterations of the Sustainability Appraisal remain published on the Council's website. All representations received during each consultation stage are published on the website for full transparency. The Sustainability Appraisal Update is considered to be an addendum of the Sustainability Appraisal and accordingly should not be read in isolation but with reference to previous iterations of the Sustainability Appraisal which are all located on the same webpage as the update.
21. It is believed that a clear audit trail is provided by the sequence of the Sustainability Appraisal documents which are dated and published on the website. Where possible the same reference numbers are used for policies considered in subsequent Sustainability Appraisals to ease referencing and the appraisals of the policy options in the SA is set out in the order of the Local Plan Review. The decision making process through Cabinet and Council are also all published on the Mid Devon website for transparency and available for public viewing. Summaries of modifications proposed at the Local Plan Review Proposed Submission (2015) stage and Local Plan Review Proposed Submission (incorporating proposed modifications) (2017) stage are provided and include reasons for the modifications proposed. These documents remain available on the Council's website. Summaries of consultation responses are also provided with responses to each comment presented by Mid Devon District Council. A collation exercise would enable the information to be provided in one document however the MDDC believe that this would result in a lengthy document which would not necessarily provide greater clarity given the quantum of information to be provided in one document. It would require a need to collate the four Sustainability Appraisal documents and would not demonstrate any new information that is not currently available publically. MDDC believe the separation of the documents which are dated provides a clear audit trail of the sequence of the options considered and the result at each stage.