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Review of Sustainability Appraisal Update in relation to the main Modifications made to the Mid Devon Local Plan Review

Review of Legal Compliance

Prepared by LUC
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Review of Sustainability Appraisal Update in relation to the main Modifications made to the Mid Devon Local Plan Review: Review of Legal Compliance

- 1.1 Mid Devon District Council (MDDC) commissioned LUC in October 2017 to undertake an independent review of the Sustainability Appraisal (SA) Update (January 2017) – referred to as the SA Update (2017), that was prepared by MDDC in relation to proposed modifications to the Local Plan Review.
- 1.2 This report presents the findings of LUC’s review, which focuses on whether the work presented in the SA Update meets the Council’s legal obligations under Section 19 of the Planning and Compulsory Purchase Act 2004, the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) and under paragraph 182 of the NPPF.
- 1.3 The SA Update (2017) has been reviewed in the context of its format, which is different to the full SA Report that was prepared by MDDC for the Proposed Submission version of the Local Plan Review in February 2015. The SA Update (2017) does not report on all of the SA work that has been undertaken in relation to the Local Plan Review at each stage of Plan preparation. Instead, it is intended to supplement the February 2015 SA Report and seeks to meet the requirement of the PPG (reference 11-021-20140306) for changes to the SA as a result of modifications to the Plan to be *‘appropriate and proportionate to the level of change being made to the Local Plan’*.
- 1.4 The review matrix in **Appendix 1** of this report illustrates whether each of the requirements of the SEA Regulations has been met within the SA Update (2017). The SA Update (2017) should be read in conjunction with previous SA documents including the February 2015 SA report, which this report does not assess.
- 1.5 LUC recommends that MDDC should make amendments to the SA Update (2017) through the inclusion of additional information and re-ordering, in order to make the SA process clearer in relation to proposed modifications made to the Local Plan Review. This report takes into account the additional work that has been carried out by the Council, which is now included in the ‘Sustainability Appraisal Update (incorporating consultant LUC recommendations) January 2018 referred to as the SA Update (2018).
- 1.6 In conclusion, LUC’s professional judgement is that the work carried out and presented in the SA Update (2018) document (taking into account the amendments MDDC has made to the SA Update 2017) is proportionate and appropriate to meet the requirements of the SEA Regulations.

Scope of the review

- 1.7 As well as reviewing the overall compliance of the SA Update (2017) document, this review has focussed on a number of specific items that MDDC has asked LUC to consider, namely:
 - 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 (policies TIV16 and SP2) that should have been subject to SA; and
 - whether there is a need to assess reasonable alternatives to other modifications in the Plan.
- 1.8 Some of the information required to reach a judgement on the above questions is not recorded in the SA Update document as it relates to work undertaken during earlier stages of the SA process. Therefore, LUC has sought to obtain additional relevant information from MDDC where required to inform a conclusion on these key issues; but a full review of the whole SA process for the Local Plan Review (as recorded in other documents) has not been undertaken as it lies outside the scope of this

commission. MDDC commissioned this report to address matters arising from the Proposed Modifications Version of the Local Plan Review (2017) and the accompanying SA Update (2017).

- 1.9 It is important to note that LUC's review has focussed on the SA process that has been undertaken and has not included a review of the detailed findings of the appraisal of site and policy options.

Findings

- 1.10 As noted above and detailed in the review matrix in **Appendix 1**, several of the requirements of the SEA Regulations are not addressed within the SA Update (2017) document. While this is not unreasonable, given that the scope of the document seeks to be proportionate to the extent of changes proposed to the Local Plan, LUC recommends that it would be helpful if the SA Update (2017) could clearly signpost where each requirement is met in previous SA reports. Going through the process of preparing a 'signposting table' of this nature would enable MDDC to identify whether requirements have been adequately met within the full SA Report (something that is outside the scope of this review). In accordance with LUC's recommendation, MDDC has now added a column to the table in **Appendix 1** and has included a 'signposting table' within the SA Update (2018) which signposts where each requirement has been met. Based on that evidence provided by MDDC, LUC is not aware of any requirements that have not been met within the SA documents prepared to date.

General observations

- 1.11 The SA Update (2017) presents further SA work that has been undertaken since the 2015 Proposed Submission consultation and addresses proposed modifications to the Local Plan Review. Specifically, it includes the following:
- Information about the SA-related consultation comments received in 2015.
 - Information about further reasonable alternative options for the Local Plan Review, related to new information sources and SA-related consultation comments where relevant.
 - Detailed SA matrices for some new and revised options.
 - Information about whether new or revised options are proposed to be taken forward as modifications to the Local Plan Review.
- 1.12 The SA Update (2017) has been prepared to be supplementary to the February 2015 full SA report and therefore the front end of the SA Update (2017) is understandably brief, with most of the content of the document presented in the four Annexes (as described on page 9 of the SA Update 2017). However, this approach means that it is quite difficult for the reader to get a clear overview of the content of the document and the key findings and LUC advises that it would be helpful for some of the information presented in the Annexes to be summarised in, or moved to, the front end of the document.
- 1.13 In particular, LUC recommends that the summary of updated SA findings in Annex 4 could usefully be presented as a conclusions section in the main body of the SA Update. MDDC has now confirmed that Annex 4 will be presented as a conclusions section in the main body of the SA Update (2018). LUC also recommends that it would be very helpful for the front end of the SA Update to include a clearer explanation of the work that has been carried out during this stage of the SA, i.e. the fact that comments on the SA, new information available and alternative options identified have all been considered and targeted additional SA work has been carried out. For the SA Update (2017), it is necessary for the reader to go through the detail of the Annexes before the approach becomes clear. MDDC has confirmed that this will be addressed through the SA Update (2018), which provides a more detailed front-end explanation.
- 1.14 LUC also recommends that it would be helpful for the front end of the SA Update to include a summary of the 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 (2017) relates to the schedules of proposed modifications that were published in November 2016 and March 2017. In order to address this point, MDDC has prepared additional explanatory text to be included at the end of the main body of the SA Update (2018).

- 1.15 The following sections present the findings of LUC's review in relation to the particular items raised by MDDC. These all relate to how reasonable alternative options to proposed modifications have been appraised.

SA of alternative options to Policy J27

- 1.16 A key proposed Modification to the Local Plan is the allocation of land at Junction 27 of the M5 for major development. This proposed change is made through the addition of Policy J27 in the Proposed Submission Local Plan (incorporating proposed modifications).
- 1.17 MDDC asked LUC to advise whether the SA Update (2017) has adequately considered reasonable alternatives to this proposal. However, answering this question requires more of a review of the options assessment process undertaken to date, rather than a review of the SA Update (2017) document in isolation. MDDC advises that an important element in the sequential site selection of main town centre uses is that proposals cannot be disaggregated and the SA Update (2018) now provides this point as it relates to site selection. A summary of the SA work undertaken is provided below.

Summary of SA work undertaken prior to SA Update

- 1.18 The Interim SA Report that was prepared by MDDC in January 2014 first considered the Junction 27 proposal through options for Policy S3: Amount and Distribution of Development. One of the options considered was for a new community. Land at M5 Junction 27 and adjoining Willand was subject to SA for alternative options of commercial or residential development.
- 1.19 The SA Report for the Proposed Submission Local Plan Review (February 2015) carried out further SA work in relation to the Junction 27 proposal. One of the options appraised under policy S2: Amount and Distribution of development was for a new community at Junction 27 and Willand. The site known as Land at M5 Junction 27 adjoining Willand was then appraised for alternative options of commercial or residential development along with the other site options being considered for allocation in the Local Plan.

SA work undertaken in the SA Update

- 1.20 Pages 113-116 in Annex 2 of the SA Update (2017) 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. MDDC has confirmed that the text in the SA Update will be amended to make clear that the reference to the 'Proposed Submission M5 Junction 27 option' is a reference to the 96 hectare 'commercial' option previously considered in the Sustainability Appraisal Proposed Submission report (2015).
- 1.21 A detailed SA matrix for the option proposed at the Full Council meeting on 1st December 2016 can be found on page 277 of Annex 3. It is stated in Annex 2 (page 113) that this matrix is based on the SA matrix prepared at Proposed Submission stage (2015) for the Junction 27 proposal, revised to reflect changes to the proposal and new information that has become available, including the Historic Environment Appraisal. It is stated that this resulted in the scores generally becoming more positive (Annex 2 p113).
- 1.22 LUC has queried with MDDC the timeline of the appraisal work that was carried out for the Junction 27 policy, in particular to what extent the proposal was appraised before the decision was made by Council on 22nd September 2016 to propose the allocation as an amendment to the Pre-Submission Local Plan. It was noted that SA work should have contributed to the decision making process. MDDC has since provided further clarification with regards to the timeline of the appraisal work. The Junction 27 proposal was assessed in the 2015 SA, as described above, but the larger site was not at that time taken forward in the Local Plan. Full Council (informed by an implications report) opted to include the Junction 27 proposal in the Local Plan on 22nd September 2016 and the appraisal of the proposal was then amended to reflect the latest proposal, with this work presented in the SA Update (2017). Although the SA Update was published in January 2017, the summary of the SA Update's findings was submitted to full Council on 1st December 2016 which agreed the Proposed Modifications (including J27) and resolved to publish them for consultation. The full SA Update (2017) informed Officers' recommendation to Council on 1st December 2016 to publish the Proposed Modifications, including J27

for consultation. On that basis, it is concluded by LUC that there was an opportunity for the SA findings to influence the decision making process.

Consideration of reasonable alternative options to the J27 proposal

- 1.23 We understand from MDDC that the proposals in Policy J27 cannot be disaggregated, and this review does not therefore need to consider constituent parts of the policy. Therefore, the assessment of reasonable alternatives would focus only on alternative options for the location of the proposal. The provision of a legal opinion on this matter is outside of the scope of this review; however LUC recommends that the Council should prepare a brief statement for inclusion in the SA Update to evidence this (perhaps linking to relevant case law) and to explain why disaggregated options are not being considered as reasonable options for the purposes of SA. MDDC has now prepared this text for inclusion in the SA Update (2018).
- 1.24 In relation to whether alternative locations to J27 were identified and discounted, paragraphs 3.32 and 3.33 of the Implication report, put to Council on 22nd September 2016 and further presented to Council on 1st December 2016, discuss the issues regarding disaggregation and that it would not be appropriate to disaggregate the uses presented in the J27 option. Options for alternative sites were looked at in the surrounding area which included consideration of alternatives at Tiverton, Crediton, Exeter, Exmouth, Taunton and Bridgwater. It was concluded there were no sequentially preferable alternative sites that could accommodate the development proposed. We also note that text on page 129 of the Proposed Submission Local Plan Review (incorporating proposed modifications) (2015) refers to a number of sites both within and outside of Mid Devon having been considered, with none being large or accessible enough for the development proposed. The Council has stated that the proposals for Junction 27 are tied to the proposed location, and that there are therefore no reasonable alternative site options (taking into account the disaggregation argument noted above). However, the SA Update (2017) did not provide any specific information about the audit trail of decision making with regards to the location of the development. LUC recommends to MDDC that the SA should make clear how the location of the J27 proposal was selected, even if this is based on other factors rather than the SA. It was recommended that additional text is added to the SA Update to clearly explain the audit trail of decision making with regards to this proposal. This should explain which sites were considered, if any were subject to SA as reasonable options, and why they were discounted. MDDC has since prepared text of this nature to be added to the SA Update (2018) which sets out the rationale.

SA of alternative options to the concomitant housing allocations

Establishing the need for additional housing allocations

- 1.25 Housing allocations were made in the 2015 Pre-Submission Draft Local Plan totalling 7,200 homes over the Plan period (360 per year). After that version of the Plan was published, the updated Strategic Housing Market Assessment (SHMA) identified a slightly higher need, for 7,600 homes (or 380 per year) over the Plan period. It was concluded that this additional need could be met without allocating additional housing sites.
- 1.26 However, research undertaken by Edge Analytics on behalf of MDDC identified additional housing requirements to meet the housing needs arising from the Junction 27 proposal. It was concluded that with the Junction 27 proposal included in the Local Plan, the overall housing requirement for the Plan period would be 7,860, or 393 dwellings per year. Therefore the additional housing requirement resulting from this proposal would be 260 dwellings during the Plan period, or 13 additional dwellings per year.
- 1.27 It was proposed at the Full Council meeting on 22nd September 2016 that two sites would be allocated to meet this additional need:
- Land at Blundells School, Tiverton (modification policy TIV16) – 200 dwellings
 - Higher Town, Sampford Peverell (modification policy SP2) – 60 dwellings
- 1.28 A key question to be addressed by this review is whether the SA Update (2017) adequately considered reasonable alternatives in relation to the allocation of these additional housing sites.

Appraisal work presented in the SA Update

- 1.29 A summary of the SA work undertaken in relation to modification policy TIV16 is presented in Annex 2 of the SA Update (2017) and the full updated SA matrix for the Blundells School site can be found in

Annex 3. The appraisal matrix previously prepared in the 2015 SA in relation to the Blundells School site has been revised to take into account some new information and these changes are reflected in the updated appraisal matrix in Annex 3. It is stated that the policy is proposed to be included as part of the Local Plan Review and that 'overall the policy scores more positively than the option considered at the Local Plan Review Proposed Submission consultation (2015)'. A number of alternative site options at Tiverton are also subject to revised SA work in the SA Update (2017) and one entirely new site option at Tiverton (Land at Seven Crosses Hill) has been appraised. There are no proposed modifications to the Local Plan in relation to those sites, i.e. they are rejected as allocations. The additional appraisal work is generally carried out to reflect additional information or consultation comments received, rather than being carried out directly for the purpose of considering the sites as options for delivering the additional housing required.

- 1.30 A summary of the SA work undertaken in relation to modification policy SP2 is also presented in Annex 2 and the full SA matrix can be found in Annex 3 of the SA Update (2017). The appraisal work previously carried out in the 2015 SA in relation to the Higher Town site has been revised to take into account some new information and this is reflected in the SA matrix in Annex 3. Again, a number of alternative options at the villages have been subject to revised appraisal work in the SA Update (2017). As with the Tiverton sites, the additional appraisal work for village sites is generally carried out to reflect additional information or consultation comments received, rather than being carried out directly for the purpose of considering the sites as options for delivering the additional housing required. LUC advises MDDC 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 Update (2017) document and why, without reading through all the detail of Annexes 2 and 3. LUC recommends that it would be very helpful to include a table upfront in the SA Update summarising this information. This should list all of the alternative options considered during the Plan making process, and noting for each whether any revised appraisal work was carried out in the SA Update (2017). In response to this recommendation, MDDC has prepared a summary table to set out why additional SA work was carried out – this will be added to the main body of the SA Update (2018), published alongside this report.

Identifying reasonable alternative options for additional housing allocations

- 1.31 This section considers what reasonable alternatives exist for the additional housing site allocations. The review focuses on the list of sites that have been considered previously in the SA process, as well as any new sites that have come forward since 2015. It is LUC's understanding that MDDC did not undertake a further process (i.e. a Call for Sites exercise) to identify entirely new site options, although a small number of new sites that had come through during consultation were considered. This is considered by LUC to be an appropriate and proportionate approach, given the need to allocate only 260 additional homes and considering the large number of rejected reasonable alternative site options.
- 1.32 The report to the Full Council meeting on 22nd September 2016, which was also available for the 1st December 2016 Council, provides some information about alternative site options that were considered for meeting the additional housing need. It states that the Planning Policy Advisory Group had considered various options for how the additional housing need could be met. The selection criteria used for identifying additional sites were:
- 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
 - sites proximate to the development proposal at Junction 27.
- 1.33 It is stated that site options at Crediton were not considered because **Crediton** is not well related to the proposal at Junction 27. For this reason, it is understood that site options at Crediton were not considered reasonable alternative options for the purposes of SA. We understand from the Council that a site at Pedlerspool, Crediton is being promoted as an alternative option for meeting the additional housing need; however we assume that the Council has discounted this site as a reasonable alternative option on the basis of its location at Crediton.
- 1.34 Similarly, the Council meeting report (of 22nd September 2016) states that site options at **Cullompton** were not considered because a significant amount of development was already proposed for the town

and any additional development would have to be phased until after the strategic highways improvements had been delivered. Cullompton was therefore not considered to be an appropriate location to meet the additional need and again, it is assumed that site options at the town were not considered to be reasonable alternatives for the purposes of SA. LUC advises that the Council will need to satisfy itself that site options at Cullompton can definitely not be considered to be reasonable options due to this deliverability issue (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. MDDC has since prepared additional text, as part of the SA Update (2018), to clarify why Cullompton is not considered to be an appropriate location for the additional housing required. The Council has advised LUC that it rejected Crediton because of distance from the J27 and Cullompton due to the significant amount of development already proposed for the town. Whilst this is in part a planning judgement, it is considered by LUC to be a reasonable sieving criterion to apply.

- 1.35 The Council meeting report (of 22nd September 2016) explains that a range of site options were considered at **Tiverton, Sampford Peverell, Hemyock, Kentisbeare, Uffculme and Willand**. The report relating to the Full Council meeting on 22nd September 2016 refers specifically to the following site options:
- Land at Hartnoll Farm, Tiverton
 - The whole of the Hartnoll Farm site, Tiverton
 - Land at Blundells School, Tiverton
 - Land at Higher Town, Sampford Peverell
 - Land south west of Connigar Close, Hemyock
 - Land at Kentisbeare, next to Village Hall
 - Various sites at Uffculme
 - Various sites at Willand
- 1.36 The Council meeting report (of 22nd September 2016) outlines the reasons why some of these sites were discounted and states that the Planning Policy Advisory Group recommended to Cabinet that if an allocation at Junction 27 was recommended to Council, then the corresponding additional housing should be met at Land at Blundells School, Tiverton and at Higher Town, Sampford Peverell. This was stated to also be the favoured approach of officers for meeting the additional housing need, should members decide to make a J27 allocation. However, no reference is made in the Council meeting report to the SA and LUC advises MDDC that the input the SA work had into the decision making process should be set out more clearly. While the Council meeting report provides high level information about the sieving criteria that were applied when considering options for the additional sites, there is no specific information in the report about why other site options at Tiverton and the villages that were considered as reasonable alternatives earlier in the Plan making process were not considered as allocations for the additional housing. This information is also not detailed in the January 2017 SA Update document, which includes only an appraisal of the policies for the two additional site allocations selected, and a limited number of revised appraisals relating to alternative site options.
- 1.37 LUC acknowledges that reasonable alternative site options to those included in the Local Plan Review Proposed Submission (incorporating proposed modifications) 2017 have been subject to SA throughout the preparation of the Local Plan Review. However, it appears that MDDC has only undertaken further SA work in the SA Update 2017 where there was new information available about the site that needed to be reflected in the SA, or address consultation comments. The SA Update 2017 does not set out a methodical process of how the list of previously rejected site options was revisited and why the two sites chosen as the additional housing sites in association with Junction 27 were selected over other options. It is therefore unclear how the SA fed into the decision making process about which additional sites to allocate.
- 1.38 LUC recommends that the further SA work required is not necessarily new appraisal work in relation to alternative site options to TIV16 and SP2. However LUC recommends that MDDC should collate the work undertaken to date regarding which sites to allocate and set this out in one place to clearly show the decision making process that was undertaken. The SA Update (2017) should accordingly include a clear audit trail listing all of the site options for housing and state which are reasonable alternatives

for allocation as additional housing sites. Justification for the selection or rejection of each option should also be provided – this may relate to planning matters unrelated to the SA process.

- 1.39 As a result of this recommendation, MDDC has prepared a table, in order to provide a full and clear audit trail of the decision making regarding the additional housing allocations - this forms part of the SA Update (2018). LUC notes that the sites allocated in the Pre-Submission Draft Local Plan are not included in the Council's audit trail table as they are already included in the Plan and so are not reasonable options for additional allocations.

Reasonable alternatives to other modifications in the Plan

- 1.40 The third and final issue highlighted by MDDC for consideration within this review is whether there is a need to assess reasonable alternatives to other modifications in the Plan. This is a very broad question which is extremely difficult for an external review to answer. Without a clear audit trail of policy options and decision making in relation to each policy topic/proposed modification, which did not appear in the SA Update (2017), it would be very difficult to establish whether this process has been completed robustly. LUC therefore recommends 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. In response to this recommendation, MDDC has prepared additional text explaining the audit trail of decision making throughout the SA process, which is published alongside this document and the SA Update (2018). This general text provides some helpful additional clarity about the process.

Conclusion

- 1.41 LUC notes that in response to the recommendations it has made as set out in this report, MDDC has carried out additional work to clarify certain elements of the appraisal work already undertaken. In accordance with LUC's advice, it has not been necessary to undertake additional SA work in relation to sites or other options; rather the work undertaken has sought to clarify the decision making process and provide a clearer audit trail.
- 1.42 In LUC's professional judgement, the work carried out and presented in the SA Update document (2018) is proportionate and appropriate to meet the requirements of the SEA Regulations.

LUC
January 2018

Appendix 1: Review Matrix

Table A1.1: Review matrix showing compliance of SA Update (January 2017) with SEA Directive requirements

SEA Directive Requirements	Covered in SA Update?	Comments and/or additional work needed to fully comply with the SEA Directive	Additional work provided by MDDC in its signposting table to show where matters have been considered in the SA. See Sustainability Appraisal Update (incorporating consultant LUC recommendations) January 2018
Information to be included in the Environmental Report – Article 5 and Annex 1 of SEA Directive			
a) an outline of the contents, main objectives of the plan, and relationship with other relevant plans and programmes;	No	It is assumed that this requirement was met in the earlier SA report for the Proposed Submission Local Plan – it would be helpful for MDDC to clearly signpost in the SA Update where in the 2015 SA report this requirement was met.	<p>Sustainability Appraisal Scoping Report (2013):</p> <p>'Chapter 1 Introduction' of this report sets out the contents and main objectives of the plan.</p> <p>'Chapter 2 Relevant plans and programmes' of this report sets out the relationship with other relevant plans and programmes.</p> <p>'Chapter 7 Appendix: Reviewed plans and programmes (full list)' provides a full list of reviewed plans and programmes.</p> <p>Interim Sustainability Appraisal (2014):</p> <p>'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.</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>Sustainability Appraisal Proposed Submission Report (2015):</p> <p>'Chapter 1 Background' of this report sets out the contents and main objectives of the Local plan. This 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>

SEA Directive Requirements	Covered in SA Update?	Comments and/or additional work needed to fully comply with the SEA Directive	Additional work provided by MDDC in its signposting table to show where matters have been considered in the SA. See Sustainability Appraisal Update (incorporating consultant LUC recommendations) January 2018
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;	No	It is assumed that this requirement was met in the earlier SA report for the Proposed Submission Local Plan – it would be helpful for MDDC to clearly signpost in the SA Update where in the 2015 SA report this requirement was met.	<p>Sustainability Appraisal Scoping Report (2013):</p> <p>'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>Interim Sustainability Appraisal (2014):</p> <p>'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>Sustainability Appraisal Proposed Modifications Report (2015):</p> <p>'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>
c) the environmental characteristics of areas likely to be significantly affected;	No	It is assumed that this requirement was met in the earlier SA report for the Proposed Submission Local Plan – it would be helpful for MDDC to clearly signpost in the SA Update where in the 2015 SA report this requirement was met.	<p>Sustainability Appraisal Scoping Report (2013):</p> <p>'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>

SEA Directive Requirements	Covered in SA Update?	Comments and/or additional work needed to fully comply with the SEA Directive	Additional work provided by MDDC in its signposting table to show where matters have been considered in the SA. See Sustainability Appraisal Update (incorporating consultant LUC recommendations) January 2018
			<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 Local Plan Review.</p> <p>Interim Sustainability Appraisal (2014):</p> <p>'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.</p> <p>'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>Sustainability Appraisal Proposed Submission Report (2015):</p> <p>'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.</p> <p>'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>
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	No	It is assumed that this requirement was met in the earlier SA report for the Proposed Submission Local Plan – it would be helpful for MDDC to clearly signpost in the SA Update where in the 2015 SA report this	<p>Sustainability Appraisal Scoping Report (2013):</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 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>Interim Sustainability Appraisal (2014):</p> <p>'Chapter 2 Sustainability Context' looks at the relevant aspects of the state of the</p>

SEA Directive Requirements	Covered in SA Update?	Comments and/or additional work needed to fully comply with the SEA Directive	Additional work provided by MDDC in its signposting table to show where matters have been considered in the SA. See Sustainability Appraisal Update (incorporating consultant LUC recommendations) January 2018
79/409/EEC and 92/43/EEC;		requirement was met.	<p>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>Sustainability Appraisal Proposed Submission Report (2015):</p> <p>'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>
e) the environmental protection objectives, established at 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;	No	It is assumed that this requirement was met in the earlier SA report for the Proposed Submission Local Plan – it would be helpful for MDDC to clearly signpost in the SA Update where in the 2015 SA report this requirement was met.	<p>Sustainability Appraisal Scoping Report (2013):</p> <p>'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 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>Interim Sustainability Appraisal (2014):</p> <p>'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</p>

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			<p>considerations to be taken into account in the Plan's preparation.</p> <p>Sustainability Appraisal Proposed Submission Report (2015):</p> <p>'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 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>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</p>	<p>None.</p>	<p>Interim Sustainability Appraisal (2014):</p> <p>'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>Sustainability Appraisal Proposed Submission Report (2015):</p> <p>'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>Sustainability Appraisal Update (2017)</p> <p>Annex 1 'Sustainability Appraisal text, methodology and cumulative impact</p>

SEA Directive Requirements	Covered in SA Update?	Comments and/or additional work needed to fully comply with the SEA Directive	Additional work provided by MDDC in its signposting table to show where matters have been considered in the SA. See Sustainability Appraisal Update (incorporating consultant LUC recommendations) January 2018
	<p>Update. 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 summarises the updated cumulative sustainability effects of the Local Plan review, taking into account the changes proposed to the Plan.</p>		<p>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. 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 summarises the updated cumulative sustainability effects of the Local Plan review as a whole, taking into account the changes proposed to the Plan.</p>

SEA Directive Requirements	Covered in SA Update?	Comments and/or additional work needed to fully comply with the SEA Directive	Additional work provided by MDDC in its signposting table to show where matters have been considered in the SA. See Sustainability Appraisal Update (incorporating consultant LUC recommendations) January 2018
g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	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.	None.	<p>Interim Sustainability Appraisal (2014):</p> <p>'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>Sustainability Appraisal Proposed Submission Report (2015):</p> <p>'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 affect the SA scores. In a number of places this results in potential significant effects being reduced.</p> <p>Sustainability Appraisal Update (2017)</p> <p>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>
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	Information about the reasons for selecting additional reasonable options for appraisal is	It would be helpful for the front end of the SA Update to include a summary of the additional alternatives that have been subject to SA within the document, including the reasons for	<p>Sustainability Appraisal Scoping Report (2013)</p> <p>This appraisal first introduces the proposed framework to assess sustainability in Chapter 5 'A framework to assess sustainability'.</p> <p>Interim Sustainability Appraisal (2014)</p> <p>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</p>

SEA Directive Requirements	Covered in SA Update?	Comments and/or additional work needed to fully comply with the SEA Directive	Additional work provided by MDDC in its signposting table to show where matters have been considered in the SA. See Sustainability Appraisal Update (incorporating consultant LUC recommendations) January 2018
<p>lack of know-how) encountered in compiling the required information;</p>	<p>provided in Annex 2 of the SA Update.</p> <p>Paragraphs 2-9 of the SA Update describe the methodology that has been used throughout the SA process and the table following paragraph 9 sets out the assumptions that have been applied to the SA of potential site allocations.</p> <p><i>More detailed analysis of the work undertaken in relation to the appraisal of reasonable alternative options can be found in the main body of this review</i></p>	<p>identifying those options. This would avoid the reader having to read through all the detail of the information in Annex 2 to understand this.</p> <p>No information is included in the SA Update regarding any difficulties encountered during the SA process. It is assumed that this information was included in the earlier SA report for the Proposed Submission Local Plan – it would be helpful for MDDC to clearly signpost in the SA Update where in the 2015 SA report this requirement was met.</p> <p><i>More details about the recommendations arising from this review in relation to the assessment of reasonable alternatives can be found in the main body of this review report.</i></p>	<p>report was based on policy options.</p> <p>Sustainability Appraisal Proposed Submission (2015)</p> <p>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> <p>Sustainability Appraisal Update (2017)</p> <p>Paragraphs 2-9 of the SA Update 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.</p> <p>Information about the reasons for selecting additional reasonable options for appraisal is provided in Annex 2 of the SA Update.</p>

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	<i>document.</i>		
i) a description of the measures envisaged concerning monitoring;	No	It is assumed that this requirement was met in the earlier SA report for the Proposed Submission Local Plan – it would be helpful for MDDC to clearly signpost in the SA update where in the February 2015 SA report this requirement was met.	Sustainability Appraisal Proposed Submission (2015) Chapter 5 'Monitoring' of the report sets out a description of the measures envisaged concerning monitoring.
j) a non-technical summary of the information provided under the above headings.	A Non-Technical Summary of the SA Update was not published. It is considered reasonable and proportionate that a Non-Technical Summary was not prepared to accompany the SA Update as the main body of the SA Update is not long enough to warrant this.	It is assumed that a Non-Technical Summary, compliant with the requirement of the SEA Regulations, was prepared to accompany the February 2015 SA Report. As noted elsewhere within this review matrix, it would be helpful for the front end of the SA Update to summarise some of the information currently included in the Annexes.	Sustainability Appraisal Proposed Submission (2015) A non-technical summary was published with the full Sustainability Appraisal Proposed Submission Report (2015).
The report must include	As shown in the	It would be helpful for	Sustainability Appraisal Scoping Report (2013)

SEA Directive Requirements	Covered in SA Update?	Comments and/or additional work needed to fully comply with the SEA Directive	Additional work provided by MDDC in its signposting table to show where matters have been considered in the SA. See Sustainability Appraisal Update (incorporating consultant LUC recommendations) January 2018
<p>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>above comments, the SA Update has included most of the information reasonably required. It is assumed that requirements not met in the SA Update are met in the February 2015 full SA Report.</p>	<p>MDDC to clearly signpost in the SA Update where in the 2015 SA report each requirement was met.</p>	<p>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>Interim Sustainability Appraisal (2014)</p> <p>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>Sustainability Appraisal Proposed Submission (2015)</p> <p>Provided the same provisions of the Interim 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>Sustainability Appraisal Update (2017)</p> <p>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</p>

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			Proposed Submission Stage consultation and proposed modifications to the Local Plan Review. The requirements not met in the SA Update are met in previous iterations of the Sustainability Appraisal.
Who should be consulted during SEA/SA process			
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)	N/A	It is assumed that the February 2015 SA Report included information on the Scoping consultation that was undertaken at the start of the SA process. It would be helpful for MDDC to clearly signpost in the SA Update where in the 2015 SA report this requirement was met.	<p>Sustainability Appraisal Scoping Report (2013):</p> <p>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>
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)	Consultation on the SA Update was undertaken between January and February 2017 alongside consultation on the proposed changes to the Local Plan Review.	It is assumed that the February 2015 SA Report included information on the consultation that has been undertaken at the each stage of the SA process. It would be helpful for MDDC to clearly signpost in the SA Update where in the 2015 SA report this requirement was met.	<p>Interim Sustainability Appraisal (2014):</p> <p>Chapter 4 'Next steps' invites representations on the contents of the Local Plan Review and this accompanying Sustainability Appraisal. Consultation was held on 24th 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>Sustainability Appraisal Proposed Submission (2015)</p> <p>Consultation was held on 9th February 2015 for 11 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>

SEA Directive Requirements	Covered in SA Update?	Comments and/or additional work needed to fully comply with the SEA Directive	Additional work provided by MDDC in its signposting table to show where matters have been considered in the SA. See Sustainability Appraisal Update (incorporating consultant LUC recommendations) January 2018
			<p>Sustainability Appraisal Update (2017)</p> <p>Consultation was held on 3rd 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>
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)	Not relevant to the SA of the Mid Devon Local Plan.	N/A	Not relevant to the SA of the Mid Devon Local Plan.
Decision-making			
The environmental report and the results of the consultations must be taken into account in decision-making (Article 8)	<p>Annex 4 in the SA Update states that information about the reasons for selecting or rejecting the additional reasonable alternatives considered is provided in Annex 2.</p> <p>The summary matrices in Annex 2</p>	It is assumed that the February 2015 SA Report included information on the reasons for selecting or rejecting the options that were considered for the Local Plan Review at each stage prior to the SA Update. It would be helpful for MDDC to clearly signpost in the SA Update where in the 2015 SA report this requirement was met.	<p>Sustainability Appraisal Scoping Report (2013)</p> <p>Consultation was undertaken on the Local Plan Review Scoping Report and the Sustainability Appraisal Scoping Report.</p> <p>Interim Sustainability Appraisal Report (2014)</p> <p>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>Sustainability Appraisal Proposed Submission Report (2015)</p>

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	<p>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.</p>		<p>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. 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 17th 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>Request for a J27 implications Report (2016)</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</p>

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			<p>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 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 there is an apparent synergy in the reasons set out in the Implications Report and the Sustainability Appraisal (2015).</p> <p>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 31st March 2017 under the delegated authority.</p> <p>Sustainability Appraisal Update (2017)</p> <p>The Local Plan Review Proposed Submission report (incorporating proposed</p>

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			<p>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 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.</p> <p>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</p>

SEA Directive Requirements	Covered in SA Update?	Comments and/or additional work needed to fully comply with the SEA Directive	Additional work provided by MDDC in its signposting table to show where matters have been considered in the SA. See Sustainability Appraisal Update (incorporating consultant LUC recommendations) January 2018
			<p>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.</p> <p>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 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>
Provision of information on the decision			
<p>When the plan or programme is adopted, the public and any countries consulted under Article 7 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> the plan or programme as adopted a statement summarising how environmental considerations have been integrated into the plan or programme and 	N/A – this requirement should be met at a later stage of the SA process.	N/A	N/A – this requirement should be met at a later stage of the SA process.

SEA Directive Requirements	Covered in SA Update?	Comments and/or additional work needed to fully comply with the SEA Directive	Additional work provided by MDDC in its signposting table to show where matters have been considered in the SA. See Sustainability Appraisal Update (incorporating consultant LUC recommendations) January 2018
<p>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</p> <ul style="list-style-type: none"> the measures decided concerning monitoring (Article 9) 			
Monitoring			
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation must be undertaken (Article 10)</p>	No	<p>It is assumed that this requirement was met in the February 2015 SA report for the Proposed Submission Local Plan – it would be helpful for MDDC to clearly signpost in the SA Update where in the 2015 SA report this requirement was met.</p>	<p>Sustainability Appraisal Proposed Submission (2015) Chapter 5 'Monitoring' sets out how the Plan will be monitored.</p>