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# **Mid Devon Local Plan Review: Proposed Main Modifications**

## **Sustainability Appraisal Addendum**

Prepared by LUC  
October 2019

**Project Title:** Sustainability Appraisal of the Proposed Main Modifications to the Mid Devon Local Plan Review

**Client:** Mid Devon District Council

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## Introduction

- 1.1 In March 2017, Mid Devon District Council submitted the Mid Devon Local Plan Review for independent examination by a Planning Inspector appointed by the Secretary of State. An integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) Report relating to the Proposed Submission Consultation version of the Local Plan Review (February 2015<sup>1</sup>) was submitted alongside the Plan, along with an SA Update document (January 2017)<sup>2</sup>, which Mid Devon District Council had prepared to take into account comments made during the 2015 Proposed Submission consultation and the proposed modifications to the Local Plan Review.
- 1.2 In January 2018, LUC prepared an independent review<sup>3</sup> of Mid Devon District Council's SA Update (2017) and as a result of that review the Council undertook some further work on the SA Update and published a revised version in January 2018<sup>4</sup>.
- 1.3 Preliminary public examination hearings were held in September 2018, followed by the main hearings which took place between 14<sup>th</sup> and 20<sup>th</sup> February 2019. Following the hearings the Inspector issued a post-hearing advice note (Examination document ID12<sup>5</sup>) in May 2019.
- 1.4 In that note the Inspector suggested a number of potential remedies to maintain a five-year supply of deliverable housing sites. The Council then prepared a document entitled 'Sustainability Appraisal of the implications of the Council's proposed draft Main Modifications in relation to the housing trajectory and the remedies suggested by the Inspector' (Examination document ED21<sup>6</sup>). That document (ED21) set out some proposed Main Modifications based on the Inspector's suggested remedies for the housing supply issue and considered their SA implications.
- 1.5 Mid Devon District Council has now prepared a full Schedule of Proposed Main Modifications to the Local Plan Review which will be published for a six-week consultation period in early 2020. The proposed modifications take into account matters raised during the examination by the Inspector and participating representors. These include modifications relating to the housing supply which were previously considered in document ED21. A number of the other proposed modifications had been previously published in the March 2017 schedule of Proposed Minor Modifications which was submitted with the Local Plan Review (see document SD14<sup>7</sup>). On the advice of the Inspector, some of these have now been reclassified as Main Modifications and so are included in the current schedule which this SA Addendum relates to.
- 1.6 This SA Addendum presents an appraisal of the Proposed Main Modifications and considers their implications for the SA findings reported previously. In relation to the housing supply issue, it builds on and supersedes the appraisal work previously presented in document ED21. In combination with the SA Report that was submitted alongside the Local Plan Review for examination and the SA Update, this SA Addendum represents an appraisal of the Local Plan Review as proposed to be modified, updating the findings presented in the February 2015 SA Report and the January 2018 SA Update. It should be noted that this is an addendum to those SA documents and that they should therefore be read together.
- 1.7 This SA Addendum focusses on the 'Main Modifications' to the Local Plan Review only. Additional Modifications have also been prepared to address non-substantive matters such as typographical,

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<sup>1</sup> Local Plan Review: Proposed Submission Consultation – Sustainability Appraisal (Mid Devon District Council, February 2015) [https://www.middevon.gov.uk/media/342890/1\\_sustainability\\_appraisal.pdf](https://www.middevon.gov.uk/media/342890/1_sustainability_appraisal.pdf)

<sup>2</sup> Local Plan Review: Proposed Submission Consultation (Incorporating Proposed Modifications) – Sustainability Appraisal Update (Mid Devon District Council, January 2017) <https://www.middevon.gov.uk/media/342723/sustainability-appraisal-update-2017.pdf>

<sup>3</sup> Review of Sustainability Appraisal Update in relation to the main Modifications made to the Mid Devon Local Plan Review - Review of Legal Compliance (LUC, January 2018) <https://www.middevon.gov.uk/media/345035/luc-sa-update-review-2018.pdf>

<sup>4</sup> Local Plan Review: Proposed Submission Consultation (Incorporating Proposed Modifications) – Sustainability Appraisal Update (Incorporating Consultant LUC Recommendations) (Mid Devon District Council, January 2018) <https://www.middevon.gov.uk/media/345036/sa-update-2018.pdf>

<sup>5</sup> <https://www.middevon.gov.uk/media/347312/id12-inspectors-mdlpr-post-hearings-advice-note.pdf>

<sup>6</sup> Sustainability Appraisal (SA) of the implications of the Council's proposed draft Main Modifications in relation to the housing trajectory and the remedies suggested by the Inspector (Mid Devon District Council, July 2019) <https://www.middevon.gov.uk/media/347814/ed21-mddc-sa-implications-of-mddc-proposed-draft-mms-in-the-hls-update-june-2019.pdf>

<sup>7</sup> Mid Devon Local Plan Review 2013-33: Schedule of Minor Modifications following 2017 modifications consultation (Mid Devon District Council, March 2017) <https://www.middevon.gov.uk/media/343278/sd14-schedule-of-proposed-minor-modifications-march-2017-v2.pdf>

factual and grammatical errors. These additional modifications are not subject to SA as they do not have the potential to lead to significant sustainability effects.

## Sustainability Appraisal and Strategic Environmental Assessment

- 1.8 The purpose of Sustainability Appraisal is to promote sustainable development by integrating sustainability considerations into the preparation and adoption of plans. Sustainability Appraisal (SA) is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the Plan-making process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process appraises the likely social, environmental and economic effects of the strategies and policies within a Development Plan Document (DPD) - in this case the Mid Devon Local Plan Review - from the outset of its development.
- 1.9 Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive<sup>8</sup>, transposed in the UK by the SEA Regulations<sup>9</sup>. The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment, and set the framework for future consent of projects requiring Environmental Impact Assessment (EIA)<sup>10</sup>. The purpose of SEA, as defined in Article 1 of the SEA Directive is *'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'*.
- 1.10 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses only on the likely environmental effects of a plan whilst SA includes a wider range of sustainability considerations, extending to social and economic impacts. The Government's Sustainability Appraisal guidance<sup>11</sup> outlines how it is possible to satisfy both requirements by undertaking a joint SA/SEA process, and to present an SA report that incorporates the requirements of the SEA Regulations. This integrated approach has been taken to the SA/SEA of the Mid Devon Local Plan Review and throughout the SA documents, the term 'SA' should be taken to mean 'SA incorporating the requirements of the SEA Regulations'.
- 1.11 Details about how the SA process has informed the preparation of the Local Plan Review at each stage can be found in the February 2015 SA Report which accompanied the examined Local Plan Review and in the January 2018 SA Update.

## Reasonable Alternatives and reasons for selecting the proposed Main Modifications

- 1.12 The February 2015 SA Report which accompanied the examined Local Plan Review, along with the January 2018 Update document, set out how reasonable alternatives were considered and selected as part of the SA and plan-making processes up until Submission, as required by the Environmental Assessment of Plans and Programmes Regulations (2004).

### Alternative options for maintaining the housing supply

- 1.13 As described above, following the Examination hearings the Inspector issued a post hearing advice note (Examination document ID12) in which he proposed four alternative options for maintaining a five-year supply of deliverable housing sites, as follows:
- 1 Bringing forward other allocated sites that are currently restricted in terms of timing with no good reason, the Policy SP2 site for example.

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<sup>8</sup> SEA Directive 2001/42/EC

<sup>9</sup> Statutory Instrument 2004, No 1633

<sup>10</sup> Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

<sup>11</sup> DCLG (2014) Planning Practice Guidance. Available at: <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/strategic-environmental-assessment-and-sustainability-appraisal-and-how-does-it-relate-to-strategic-environmental-assessment/>

- 2 Bringing forward the contingency sites.
  - 3 Extending existing allocations to accommodate more dwellings (the Policy WI1 site for example) or increasing densities to allow for more dwellings on allocated sites that are less constrained.
  - 4 Allocating a new, large site not constrained by the link road (or motorway junctions) that can come on stream quickly and bolster supply in the early years of the Plan while infrastructure is provided elsewhere.
- 1.14 Mid Devon District Council identified some proposed draft Main Modifications based on its preferred options from these suggested remedies and prepared an SA document relating to these proposed modifications (document ED21) in July 2019. The Council's preferred approach involved:
- Bringing forward the delivery of the allocated site SP2 (Higher Town, Sampford Peverell) which was restricted in the submitted Local Plan Review in terms of timing. As detailed in **Table 1** this delay is no longer necessary.
  - Bringing forward the delivery of the site at Colebrook, Cullompton (policy CU21) and removing its contingency status.
  - Bringing forward the delivery of the allocated Cullompton East site (policies CU7-12).
- 1.15 For completeness, the Council's July 2019 SA document (ED21) also sought to assess the SA implications of the Inspector's four suggested options that were not proposed as draft modifications at the time, i.e. the options that the Council had rejected.
- 1.16 LUC has reviewed the July 2019 SA document as part of the preparation of this SA Addendum and it has been concluded that some supplementary work on the SA of the Inspector's options is required, in order to ensure that the appraisal adequately considers the likely significant sustainability effects of each option were it to be taken forward. In document ED21, the sustainability implications of implementing the preferred options were described, but the implications of the rejected options were only considered in terms of the likely effects of rejecting the options, i.e. that there would not be any sustainability implications. The likely significant sustainability effects of taking those options forward, had they not been rejected, were not clearly described.
- 1.17 Therefore, **Table 1** below presents a summary of the SA implications of each of the Inspector's four suggested remedies, including variations within them:
- 1. Bringing forward other allocated sites that are currently restricted in terms of timing with no good reason: SP2 Higher Town, Sampford Peverell.
  - 2. Bringing forward the contingency site: CU21 Colebrook, Cullompton.
  - 2. Bringing forward the contingency sites: TIV13 Tidcombe Hall, Tiverton.
  - 2. Bringing forward the contingency site: CU7-12 Cullompton East.
  - 3. Extending existing allocations to accommodate more dwellings (the policy WI1 Willand for example).
  - 3. Increasing densities to allow for more dwellings on allocated sites that are less constrained.
  - 4. Allocating a new, large site not constrained by the link road (or motorway junctions) that can come on stream quickly and bolster supply in the early years of the Plan while infrastructure is provided elsewhere.
- 1.18 **Table 1** builds on the appraisal work set out in ED21, expanding and revising it where appropriate. There is some uncertainty around whether all of these options are in fact 'reasonable' for the purposes of SA; however, in line with the precautionary approach all have been considered in terms of their SA implications.
- 1.19 The Council's proposed modifications relating to the housing supply are now included in the complete schedule of Proposed Main Modifications to the Local Plan Review (see **Table 2** further ahead in this document), and their implications for the SA findings reported previously (in the

February 2015 SA Report and in the January 2018 SA Update) are also detailed there along with those of the other Proposed Main Modifications.

- 1.20 No further reasonable alternatives to the Proposed Main Modifications have been identified, given that reasonable alternatives were appraised up to the submission of the Local Plan, and that preparation of the Proposed Main Modifications was led by the Inspector. Where the Inspector identified alternative options, these have been appraised in document ED21 and in **Table 1** below.

**Table 1: SA of the Inspector’s alternative remedies for maintaining a five-year supply of deliverable housing sites**

Inspector’s suggested remedies to housing land supply	SA implications	Included as a Proposed Main Modification?	Mid Devon District Council’s reasons for decision making
<p>1. Bringing forward other allocated sites that are currently restricted in terms of timing with no good reason: SP2 Higher Town, Sampford Peverell</p>	<p>The site allocation SP2 Higher Town, Sampford Peverell has previously been assessed in the SA Update 2017 (Document SD03 pp144-146 and pp 309-312). See also the SA Update 2018 (incorporating proposed amendments) - Document SA-02 (pages 201-203 and 366–369).</p> <p>The likely effects of this site on the SA objectives are not affected by the proposal to bring forward its delivery. However, bringing forward the delivery of the site would mean that the effects previously identified would occur earlier in the Plan period. As this option has been taken forward into the Proposed Main Modifications, the SA implications of this proposed modification are considered further in <b>Table 2</b> (see MM01, MM42 and MM43).</p>	<p>Yes (see MM01, MM42 and MM43 in <b>Table 2</b>)</p>	<p>In response to the Inspector’s post hearings advice note:</p> <p>“...Given that the Policy SP2 allocation is designed to address part of that overall housing requirement, the tie serves no purpose. Reference to it should be removed.”</p> <p>In response to the Inspector’s post hearings advice note:</p> <p>“It was clear from the helpful submissions of the Highway Authority, that the limitation on development until the completion of improved access works to the A361 is unnecessary. Criterion b) needs to be removed.”</p> <p>At the time of decision making, this site was subject to an outline planning application for 60 dwellings (17/01359/MOUT).</p>
<p>2. Bringing forward the contingency site: CU21 Colebrook, Cullompton</p>	<p>The contingency site CU21 Colebrook, Cullompton has previously been assessed through the SA (see pages 298 – 302 of the SA 2015 SD04b Appendix 2 (Part 1 Strategic Policies and Town Allocations). A more extensive site comprising 400 dwellings was considered but rejected at pp147-9 of the 2018 Update (SA-02).</p> <p>The likely effects of this site on the SA objectives are not affected by the proposal to bring forward its delivery and remove its contingency status. However, bringing</p>	<p>Yes (see MM01 and MM35 in <b>Table 2</b>)</p>	<p>Devon County Council’s Hearing Statement has recommended that the supporting paragraph (3.149) to Policy CU21 be amended to include additional text (italicised) after the words “Site commencement will also need to be deferred until after the completion of the through route linking Willand Road to Tiverton Road, which is being provided</p>

Inspector's suggested remedies to housing land supply	SA implications	Included as a Proposed Main Modification?	Mid Devon District Council's reasons for decision making
	<p>forward the delivery of the site would mean that the effects previously identified would occur earlier in the Plan period and the removal of the contingency status means that the effects are more certain to occur. As this option has been taken forward into the Proposed Main Modifications, the SA implications of the proposed modification are considered further in <b>Table 2</b> (see MM01 and MM35).</p>		<p>as part of the North West Cullompton allocation <i>unless satisfactory evidence or mitigation to address air quality and highway capacity can be sustained</i>".</p> <p>Devon County Council has advised in its hearing statement that 100 dwellings at Colebrook can come forward without the Town Centre Relief Road (TCRR).</p> <p>At the time of decision making this site was subject to an outline planning application (19/00118/MOUT) for 105 dwellings.</p>
<p>2. Bringing forward the contingency sites: TIV13 Tidcombe Hall, Tiverton</p>	<p>The contingency site TIV13 Tidcombe Hall has previously been assessed through the SA (pages 222 – 226 of the SA 2015 SD04b Appendix 2 (Part 1 Strategic Policies and Town Allocations) and P116-9 and 289-293 of the 2018 Update (SA02).</p> <p>The likely effects of this site on the SA objectives are not affected by the option of bringing forward its delivery and removing its contingency status. However, bringing forward the delivery of the site would mean that the effects previously identified would occur earlier in the Plan period and the removal of the contingency status would mean that the effects would be more certain to occur. A likely significant positive effect was previously identified in relation to SA objective G (meeting housing needs) and a significant negative effect was previously identified in relation to SA objective D (resource use). As this option has not been included as a Main Modification the likely effects of TIV13 remain as presented in the 2015 SA Report and</p>	<p>No</p>	<p>No new evidence or advice has been provided by participants at the examination hearings in relation to this contingency site as part of their submissions made for the examination hearings.</p> <p>The Council's HLS update June 2019 can demonstrate that a five year supply of deliverable sites will be maintained over the initial five years and subsequent periods with the proposed draft Main Modifications, without the need to bring forward the TIV13 Tidcombe Hall contingency site.</p> <p>It is noted that the Inspector's advice seeks to bring forward <i>deliverable</i> sites to boost the delivery of housing in the early years of the Plan, and it does not seek to increase the overall housing</p>

Inspector's suggested remedies to housing land supply	SA implications	Included as a Proposed Main Modification?	Mid Devon District Council's reasons for decision making
	2018 Update.		requirement for the district. In this specific context, sites that do not have a realistic prospect of yielding completions within five years cannot be considered as reasonable alternatives to the measures proposed. In the case of the site at Tidcombe Hall (TIV 13), the Council has reason to believe that there may be land assembly issues.
2. Bringing forward the contingency site: CU7-12 Cullompton East	<p>Policies CU7 -12 Cullompton East have previously been assessed through the SA (pages 264 – 271 of the SA 2015 SD04b Appendix 2 (Part 1 Strategic Policies and Town Allocations)).</p> <p>The likely effects of this site on the SA objectives are not affected by the proposal to bring forward its delivery. However, bringing forward the delivery of the site means that the effects previously identified would occur earlier in the Plan period (although not within the initial five years, see next column). As this option has been taken forward into the Proposed Main Modifications, the SA implications of the proposed modification are considered further in <b>Table 2</b> (see MM01).</p>	Yes (see MM01 in <b>Table 2</b> )	<p>The amended trajectory for the East Cullompton allocation sees completions from the initial phase beginning in 2023/24. This is outside the initial five-year period so it is not anticipated that the East Cullompton allocation will contribute to the initial five year housing land supply.</p> <p>Advice has been provided to the examination hearings in the Statement of Common Ground between Mid Devon District Council, Devon County Council and Highways England (SCG10). This makes clear that based on technical modelling reports provided (in Devon County Council's hearing statement), Devon County Council and Highways England conclude the first 500 dwellings at East Cullompton (part of CU7 – CU12 Cullompton East) require the delivery of the proposed Town Centre Relief Road (TCRR). At the time of decision making, a planning application for the TCRR was</p>

Inspector's suggested remedies to housing land supply	SA implications	Included as a Proposed Main Modification?	Mid Devon District Council's reasons for decision making
			expected to come forward in autumn 2019. The Council is currently working on the precautionary assumption, for Local Plan Review housing trajectory purposes, that the TCRR will be delivered by the very latest in 2023.
3. Extending existing allocations to accommodate more dwellings (the policy WI1 Willand for example).	<p>The Willand site has been considered as part of the SA process (p385 of the January 2018 SA Update (SA-02).</p> <p>The likely sustainability effects of extending existing allocations would depend largely on which allocations are extended and in which direction, as the effects will be determined by factors such as the proximity of the extended development area to areas of high landscape sensitivity or designated biodiversity sites for example. Many of the effects of this approach are therefore uncertain at this stage. However, it is likely that extending the existing allocations would result in more negative effects on SA objectives A (natural environment) and B (historic environment). However, it may be that increasing the size of allocations could stimulate the provision of a wider range of services and facilities and infrastructure, which could result in positive effects on SA objectives H (community health and wellbeing) and I (infrastructure). There may also be positive effects on SA objective C (climate change) if increasing the size of allocations means that it becomes viable to provide more employment land, services and facilities within the sites, enabling them to develop as more self-sufficient communities and reducing the need to drive day-to-day.</p>	No	<p>Planning application reference 18/00175/MOUT was refused on 9th October 2018 for 125 dwellings at Meadow Park, Silver Street, Willand as being out of scale and size to the settlement and available facilities in the settlement. It is therefore inconsistent with the Local Plan's strategy for the distribution of development. It is noted that, at the time of decision making, this application was the subject of appeal. Pending the outcome of the appeal, the site was not a reasonable alternative.</p>

Inspector's suggested remedies to housing land supply	SA implications	Included as a Proposed Main Modification?	Mid Devon District Council's reasons for decision making
<p>3. Increasing densities to allow for more dwellings on allocated sites that are less constrained.</p>	<p>Increasing densities on allocated sites could have positive effects on SA objectives A (natural environment) and D (minimising resource use) as it may be possible to deliver more homes without increasing land take, thereby reducing the loss of greenfield land and the potential impacts on the landscape, biodiversity etc. However, increasing densities may reduce the quality of the housing and the wider built environment within those sites, having negative effects on SA objectives B (built environment) and G (meeting housing needs). There may also be a negative effect on SA objective H (community health and wellbeing) if housing density is increased to the detriment of the overall quality of the living environment within the sites.</p>	<p>No</p>	<p>The Council's HLS update June 2019 can demonstrate that a five-year supply of deliverable sites will be maintained over the initial five years and subsequent periods with the proposed draft Main Modifications, without the need to increase densities for more dwellings on allocated sites that are less constrained. Site allocation densities have been assessed at an average of 30-50 dwellings per hectare for the net developable area, allowing for internal roads, landscaping etc.</p> <p>Strategic urban extensions have been subject to masterplanning that has provided a more detailed assessment of potential development capacity. Higher density ranges were considered in urban areas (see pp5-6 of the Exeter HMA SHLAA Methodology HOU01a). The most appropriate density within these ranges is considered on a site by site basis (see HOU01b-h). Eventual densities achieved will be dependent on detailed planning proposals stage.</p> <p>It is noted that the Inspector's advice seeks to bring forward <i>deliverable</i> sites to boost the delivery of housing in the early years of the Plan, and it does not seek to increase the overall housing requirement for the district. In this specific context, sites that do not have a</p>

Inspector's suggested remedies to housing land supply	SA implications	Included as a Proposed Main Modification?	Mid Devon District Council's reasons for decision making
			<p>realistic prospect of yielding completions within five years cannot be considered as reasonable alternatives to the measures proposed.</p> <p>Larger urban extensions, or additions to allocated urban extensions, are not considered by the Council to be deliverable in five years. Seeking a blanket increase across the Plan could not rule out harmful impacts. Density would be more appropriately considered on a site by site basis at planning application stage.</p>
<p>4. Allocating a new, large site not constrained by the link road (or motorway junctions) that can come on stream quickly and bolster supply in the early years of the Plan while infrastructure is provided elsewhere.</p>	<p>The likely sustainability effects of a new large site allocation are largely uncertain at this stage as they would depend on its location and its proximity to sensitive receptors such as biodiversity sites. However, allocating a new large, presumably greenfield site is likely to result in more negative effects on SA objectives A (natural environment) and B (historic environment). However, it may be that providing a new large site allocation could stimulate the provision of a wider range of services and facilities and infrastructure within the site, which could result in positive effects on SA objectives H (community health and wellbeing) and I (infrastructure). There may also be positive effects on SA objective C (climate change) if the larger size of the allocation means that it becomes viable to provide more employment land, services and facilities within the site, enabling it to develop as a more self-sufficient community and reducing the need to drive day-to-day. Finally, allocating a site that is unconstrained in terms of</p>	<p>No</p>	<p>Large sites are unlikely to contribute to the housing land supply in the first five years of the Plan due to the need for infrastructure provision, site preparation. They would also need masterplanning and potential land assembly. Reasonable alternative site options have previously been assessed through the preparation of the Local Plan Review and tested through the Sustainability Appraisal.</p>

<b>Inspector's suggested remedies to housing land supply</b>	<b>SA implications</b>	<b>Included as a Proposed Main Modification?</b>	<b>Mid Devon District Council's reasons for decision making</b>
	the road infrastructure could have a positive effect on SA objective G (meeting housing needs) as this approach would mean the housing is more likely to be able to be delivered within the early years of the Plan.		

## Appraisal Process

### Sustainability Objectives

- 1.21 Each policy and site allocation has been assessed against a framework of SA objectives throughout the preparation of the Local Plan Review. Development of an SA framework is not a requirement of the SEA Regulations; however it provides a recognised way in which the likely sustainability effects of a plan can be predicted, described, analysed and compared in a consistent way. The SA framework sets out a series of sustainability objectives and associated questions which can be used to 'interrogate' options and policies drafted during the plan-making process. These SA objectives define the long-term aspirations of the District with regard to social, economic and environmental considerations. During the SA, the performance of the plan options (and later, policies) are assessed against these SA objectives and appraisal questions.
- 1.22 Mid Devon's SA framework is presented in **Appendix 1** and covers all of the topics required in the SEA Regulations. The same SA framework that was used to appraise previous iterations of the Local Plan Review has been used in the appraisal of the Proposed Main Modifications.
- 1.23 Throughout the SA process, judgements and symbols showing the likely effect that each element of the Local Plan Review would have on each SA objective have been presented in matrices. **Figure 1** below sets out the symbols used to illustrate each type of effect.

**Figure 1 Key to symbols and colour coding used in the SA of the Mid Devon Local Plan Review**

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

- 1.24 **Appendix 2** presents an update to the baseline information and review of plans, policies and programmes that was previously set out in the February 2015 SA Report.

## SA conclusions for the examined Local Plan Review

### SA Report for the Proposed Submission Consultation Local Plan Review (February 2015)

- 1.25 The policies and site allocations in the Local Plan Review and the reasonable alternatives considered during its preparation were subject to a detailed appraisal against the SA objectives which were developed at the scoping stage of the SA process. It was concluded that the SA has played an integral role in the development of the Local Plan Review. It has been used to consider

the various strategic options and inform the most sustainable approach for the District. The SA has led to the refinement of policies to minimise adverse impacts and has ensured that sustainability issues for the District are addressed. The wording of the specific site policies seeks to ensure that potential negative effects resulting from the development of sites are addressed at masterplanning and/or planning application stage.

- 1.26 In general, the emerging Local Plan Review was found to have a wide range of positive and significant positive effects on the objectives, both cumulatively and through individual policies, although a number of potentially adverse impacts still remain. Recommendations made in previous iterations of the SA report and the proposed submission SA report have generally been thoroughly addressed, which has provided mitigation for potential adverse effects for both individual policies/proposals and the Local Plan Review as a whole.

### SA Update (January 2018)

- 1.27 The SA Update document (originally published in January 2017 and updated in January 2018) was prepared to take into account comments made during the 2015 Proposed Submission consultation and some proposed modifications to the Local Plan Review. The SA Update document considered additional reasonable alternatives and new information. The majority of proposed changes comprised minor amendments to the policies or supporting text, although more significant amendments to the Plan included the proposed allocation of land at Junction 27 of the M5 and associated housing, as well as an amended housing total to reflect up-to-date evidence on housing needs. The allocation of land at the M5 was found to have broadly positive impacts because it will promote economic growth and employment and because controls are set out to ensure the necessary infrastructure is in place and the resulting housing need is met. While potential negative effects were identified in relation to SA objectives A (natural environment), C (climate change) and D (resource use), these were not found to be significant.
- 1.28 Recommendations made in previous iterations of the SA report and in the SA Update, as well as controls through policy, have provided mitigation for potential adverse effects. Of the main changes proposed in this iteration of the SA, the main negative impact on the Local Plan Review as a whole was from the deletion of a contingency site (Wynnards Mead, Tiverton). The deletion of this policy reduced the flexibility of the Plan as a whole, given the role of contingency sites in ensuring housing delivery during the Plan period. However, on balance, the sustainability issues of the site were found by the Council to outweigh the benefit of the inclusion of the contingency site. Two other contingency sites in the plan remained and therefore flexibility was still found to remain in the Plan. The other changes to the Plan were considered largely beneficial.

## Appraisal of the Main Modifications

- 1.29 **Table 2** overleaf presents the schedule of Proposed Main Modifications and the Council's reasons for proposing each change, with a final column added to record the implications of each Main Modification for the SA conclusions reported previously. The SA implications have been considered based on whether each Main Modification changes the conclusions of the February 2015 SA Report for the Proposed Submission Consultation version of the Local Plan Review, as updated in the January 2018 SA Update where relevant.

**Table 2: Assessment of proposed Main Modifications in relation to the SA conclusions reported previously**

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																			
MM01	Overall Provision of housing and employment	26-27	<p>Replace Table 6: Housing forecast 2013 – 2033 with the following update:</p> <table border="1" data-bbox="600 464 1151 1299"> <thead> <tr> <th>Location/Site</th> <th>Policy</th> <th>2013/14</th> <th>2014/15</th> <th>2015/16</th> <th>2016/17</th> <th>2017/18</th> <th>2018/19</th> <th>2019/20</th> <th>2020/21</th> <th>2021/22</th> <th>2022/23</th> <th>2023/24</th> <th>2024/25</th> <th>2025/26</th> <th>2026/27</th> <th>2027/28</th> <th>2028/29</th> <th>2029/30</th> <th>2030/31</th> <th>2031/32</th> <th>2032/33</th> <th>2033/34</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td colspan="24"><b>Tiverton</b></td> </tr> <tr> <td>Eastern Urban Extension</td> <td>TV1-TV6</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>26</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>25</td><td>550</td> </tr> <tr> <td>Howden Court</td> <td>TV9</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>10</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>10</td> </tr> <tr> <td>Roundhill</td> <td>TV10</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>12</td><td>8</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>20</td> </tr> <tr> <td>Phoenix Lane</td> <td>TV12</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>4</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>60</td> </tr> <tr> <td>Tidcombe Hall (contingency)</td> <td>TV13</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>25</td><td>31</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>0</td> </tr> <tr> <td>Blundells School</td> <td>TV16</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>12</td><td>25</td><td>25</td><td>50</td><td>50</td><td>38</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>200</td> </tr> <tr> <td>Commitments</td> <td></td> <td></td><td></td><td></td><td></td><td></td><td></td><td>107</td><td>149</td><td>136</td><td>143</td><td>135</td><td>108</td><td>100</td><td>100</td><td>100</td><td>100</td><td>97</td><td></td><td></td><td></td><td></td><td>1275</td> </tr> <tr> <td>Completions</td> <td></td> <td>93</td><td>70</td><td>88</td><td>89</td><td>128</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>478</td> </tr> <tr> <td>Tiverton Total</td> <td></td> <td>93</td><td>70</td><td>88</td><td>89</td><td>128</td><td>107</td><td>149</td><td>152</td><td>180</td><td>178</td><td>183</td><td>181</td><td>138</td><td>125</td><td>200</td><td>197</td><td>100</td><td>100</td><td>100</td><td>25</td><td>2593</td> </tr> <tr> <td colspan="24"><b>Cullompton</b></td> </tr> <tr> <td>NW Cullompton</td> <td>CU1-CU6</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>49</td><td>100</td><td>100</td><td>150</td><td>150</td><td>176</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>25</td><td>1350</td> </tr> <tr> <td>East Cullompton</td> <td>CU7-CU12</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>50</td><td>125</td><td>175</td><td>200</td><td>200</td><td>200</td><td>200</td><td>200</td><td>200</td><td>200</td><td>200</td><td>1750</td> </tr> <tr> <td>Ware Park and Footlands</td> <td>CU14</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>25</td><td>13</td><td></td><td></td><td></td><td></td><td></td><td></td><td>38</td> </tr> <tr> <td>Colebrook</td> <td>CU21</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>100</td> </tr> <tr> <td>Commitments</td> <td></td> <td></td><td></td><td></td><td></td><td></td><td></td><td>91</td><td>71</td><td>83</td><td>25</td><td>12</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>252</td> </tr> <tr> <td>Completions</td> <td></td> <td>87</td><td>78</td><td>44</td><td>98</td><td>238</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>545</td> </tr> <tr> <td>Cullompton Total</td> 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Town</td> <td>SP2</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>12</td><td>25</td><td>23</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>60</td> </tr> <tr> <td>Fannys Lane</td> <td>SA1</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>8</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>8</td> </tr> <tr> <td>Old Butterleigh Road</td> <td>SI1</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>8</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>8</td> </tr> <tr> <td>The Garage</td> <td>SI2</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>5</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>5</td> </tr> <tr> <td>South of Broadlands</td> <td>TH1</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>12</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>12</td> </tr> <tr> <td>Land east of MS</td> <td>WI1</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>12</td><td>25</td><td>5</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>42</td> </tr> <tr> <td>Commitments</td> <td></td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>273</td><td>242</td><td>255</td><td>26</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>796</td> </tr> <tr> <td>Completions</td> <td></td> <td>82</td><td>137</td><td>128</td><td>100</td><td>124</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>571</td> </tr> <tr> <td>Rural sites Total</td> <td></td> <td>82</td><td>137</td><td>128</td><td>100</td><td>124</td><td>273</td><td>255</td><td>339</td><td>324</td><td>65</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>1627</td> </tr> <tr> <td><b>Total (Mid Devon - all areas)</b></td> <td></td> <td><b>220</b></td><td><b>216</b></td><td><b>288</b></td><td><b>204</b></td><td><b>502</b></td><td><b>574</b></td><td><b>574</b></td><td><b>695</b></td><td><b>619</b></td><td><b>439</b></td><td><b>604</b></td><td><b>631</b></td><td><b>383</b></td><td><b>428</b></td><td><b>500</b></td><td><b>497</b></td><td><b>400</b></td><td><b>400</b></td><td><b>400</b></td><td><b>250</b></td><td><b>9234</b></td> </tr> <tr> <td><b>Five year totals</b></td> <td></td> <td></td><td></td><td></td><td></td><td></td><td>1730</td><td></td><td>2801</td><td></td><td></td><td></td><td></td><td>2756</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>1947</td> </tr> <tr> <td><b>Cumulative five year totals</b></td> <td></td> <td></td><td></td><td></td><td></td><td></td><td>1730</td><td></td><td>4531</td><td></td><td></td><td></td><td></td><td>7287</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>9234</td> </tr> </tbody> </table>	Location/Site	Policy	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	Total	<b>Tiverton</b>																								Eastern Urban Extension	TV1-TV6														26	100	100	100	100	100	100	25	550	Howden Court	TV9										10												10	Roundhill	TV10										12	8											20	Phoenix Lane	TV12								4														60	Tidcombe Hall (contingency)	TV13											25	31										0	Blundells School	TV16								12	25	25	50	50	38									200	Commitments								107	149	136	143	135	108	100	100	100	100	97					1275	Completions		93	70	88	89	128																	478	Tiverton Total		93	70	88	89	128	107	149	152	180	178	183	181	138	125	200	197	100	100	100	25	2593	<b>Cullompton</b>																								NW Cullompton	CU1-CU6								49	100	100	150	150	176	100	100	100	100	100	100	25	1350	East Cullompton	CU7-CU12											50	125	175	200	200	200	200	200	200	200	200	1750	Ware Park and Footlands	CU14														25	13							38	Colebrook	CU21																						100	Commitments								91	71	83	25	12											252	Completions		87	78	44	98	238																	545	Cullompton Total		87	78	44	98	238	91	71	114	150	137	238	275	376	313	300	300	300	300	300	275	4035	<b>Crediton</b>																								Red Hill Cross	CRE2										12	50	50	23									135	Woods Group	CRE4											8											8	Pedlarspool	CRE5									12	25	25	50	50	38								200	Sports Fields	CRE6										12	50	50	8									120	Stonewall Lane	CRE7											25	25										50	Land at Barn Park	CRE8										12	8											20	Alexandra Close	CRE9										12	3											15	Commitments								103	99	54	29	10											295	Completions		58	31	18	17	12																	136	Crediton Total		58	31	18	17	12	103	99	90	65	59	183	175	65	0	0	0	0	0	0	0	0	979	<b>Rural sites</b>																								Newton Square	BA1										5												5	Hollywell	BD1										12	8											20	Welle Road	BR1									7													7	Barton	CH1										12	8											20	Land off Church Lane	CB1										12	8											20	Barnhill Close	CF1										7												7	Linhay Close	CL1										6												6	Land adj Fishers Way	HA1										10												10	Greenaway	MD1										12	8											20	Former Tiverton Parkway Hotel	SP1										10												10	Higher 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6: Housing Forecast 2013 – 2033 is provided in the Council’s “Housing Land Supply Update – Addendum to January 2019 update in response to the Inspector’s Post Hearings Advice Note (June 2019)” which is appended to this schedule of Proposed Main Modifications.</p>	<p><b>No change to SA findings:</b> This proposed modification comprises an updated housing forecast table which provides context for Policy S2 and certain site allocations policies, proposed modifications to which are considered separately below.</p>
Location/Site	Policy	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	Total																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
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<b>Total (Mid Devon - all areas)</b>		<b>220</b>	<b>216</b>	<b>288</b>	<b>204</b>	<b>502</b>	<b>574</b>	<b>574</b>	<b>695</b>	<b>619</b>	<b>439</b>	<b>604</b>	<b>631</b>	<b>383</b>	<b>428</b>	<b>500</b>	<b>497</b>	<b>400</b>	<b>400</b>	<b>400</b>	<b>250</b>	<b>9234</b>																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																		
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MM02	S1: Sustainable		Amend criterion i) as follows:	Taken from Submission Document SD14.	<b>No change to SA findings:</b> The																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																			

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
	Development Priorities		"...recreational trails, <del>and</del> -accessible land, <b>and other green infrastructure</b> , and opportunities...."	Included as a main modification in accordance with the Inspector's post hearing advice note. Modification proposed to reflect representation made by Natural England during the 2017 modifications consultation.	additional wording relating to green infrastructure reinforces the already significant positive (+3) effects identified in relation to SA objectives A (natural environment), B (built environment), C (climate change) and H (health and wellbeing) for policy S1.
MM03	S2: Amount and Distribution of Development	32	"The diverse needs of the community will be met through the provision of <b>a minimum of approximately 7,860</b> <del>7,200</del> dwellings and 147,000 <del>154,000</del> square metres of commercial floorspace between 1 <sup>st</sup> April 2013 and 31 <sup>st</sup> March 2033."	In response to the Inspector's post hearings advice note:  "...content that the OAN figure of 78 (393pa) is soundly derived, as is the extent of commercial development envisaged. That said, while I appreciated the headroom allowed for, to comply with the (2012 version of) the Framework, these figures must be expressed as a minima in Policy S2."	<b>No change to SA findings:</b> The presentation of the total housing figure for the Local Plan Review as a minimum rather than as an approximate figure is not expected to have a significant effect on the eventual number of homes to be provided. The already significant positive (+3) effect identified for this policy in relation to SA objective G (meeting housing needs) is unchanged.
MM04	S3: Meeting Housing Needs	34	Amend criterion a) as follows:  "The diverse needs of Mid Devon will be met through the provision of <b>a minimum of approximately 7,860</b> <del>7,200</del> dwellings between 1 <sup>st</sup> April 2013 and 31 <sup>st</sup> March 2033."	In response to the Inspector's advice note:  "...content that the OAN figure of 78 (393pa) is soundly derived, as is the extent of commercial development envisaged. That said, while I appreciated the headroom allowed for, to comply with the (2012 version of) the Framework, these figures must be expressed as a minima in Policy S2"	<b>No change to SA findings:</b> The presentation of the total housing figure for the Local Plan Review as a minimum rather than as an approximate figure is not expected to have a significant effect on the eventual number of homes to be provided. The already significant positive (+3) effect identified for this policy in relation to SA objective G (meeting housing needs) is unchanged.

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
MM05	2.31	36	<p>Amend paragraph 2.31 of the supporting text as follows:</p> <p>“....The need for gypsy and traveller pitches will be accommodated by pitches within larger housing sites, for example at Tiverton Eastern Urban Extension, North West Cullompton, East Cullompton and Pedlerspool in Crediton. <b><u>The Council’s preferred approach is for on-site provision as part of larger housing proposals TIV1, CU1, CU7 and CRE5. Provision off-site will only be accepted where it is demonstrated that provision on a different site would achieve a more favourable outcome for Gypsies and Travellers as described in Policy DM7. Where such a more favourable outcome can be demonstrated, off-site provision must meet the requirements of Policy DM7, and a mechanism must be put in place to ensure that the pitches are delivered. This will usually be through a s106 agreement requiring the developer to identify and obtain planning permission (which will not be unreasonably withheld by the Council) for the required number and standard of pitches. The pitches will be provided by the development itself or where the land is transferred for a nominal value, by an agreed third party Registered Provider or other agreed private provider, for the sole purpose of occupation and ancillary business by</u></b></p>	<p>In response to the Inspector’s post hearings advice note and to ensure consistency with MM proposed for Policy DM7.</p>	<p><b>No change to SA findings:</b> The proposed amendment to the supporting text of policy S3 reflects the proposed changes to the wording of policy DM7, which are considered separately below in terms of their implications for the SA findings.</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<p><b><u>Gypsies and Travellers. The off-site provision of pitches must be provided and made available for occupation before the occupation of a specified proportion of the provision of on-site open market dwellings as part of the larger housing proposal at TIV1, CU1, CU7 or CRE5. Where the off-site provision of pitches generates additional infrastructure needs, developers of the larger housing proposal at TIV1, CU1, CU7 or CRE5 will be expected to contribute fairly towards the cost in accordance with Policies S8 and DM7 of this Plan. The Council is working with the travelling showpeople community to approve a large site near Cullompton which would meet the need requirements set out in the GTAA. Policy DM7 (gypsy and traveller accommodation) manages the development of specific sites"</u></b></p>		
MM06	S8: Infrastructure	46	<p>Modification to include following text at the end of the policy text:</p> <p><b><u>"Planning permission will be granted only where the impact of development is not considered to be severe. Where severe impacts that are attributable to the development are considered likely, including as a consequence of cumulative impacts, they must be subject to satisfactory mitigation having regard to the latest</u></b></p>	Amendment agreed within Statement of Common Ground (SCG-10) between MDDC, Devon County Council and Highways England.	<b>No change to SA findings:</b> The proposed amendment to the policy text does not affect the overall meaning of policy S8, and does not affect the significant positive (+3) effect that has already been identified in relation to SA objective I (infrastructure). While the proposed additional text could provide some additional mitigation for any negative effects from infrastructure development that may arise in

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<u>infrastructure plan</u> ".		relation to SA objectives A (natural environment) and B (built environment), this is not considered to affect the minor negative (-1) and negligible (0) effects already identified for these objectives respectively.
MM07	S9: Environment	48	Amend criterion e) as follows: "The preservation and enhancement of the distinctive qualities of Mid Devon's natural landscape, supporting opportunities identified within the landscape character areas. Within <del>or adjoining</del> the Blackdown Hills Area of Outstanding Natural Beauty, <b>and within the setting of the Blackdown Hills Area of Outstanding Natural Beauty</b> , and Exmoor and Dartmoor National Parks, the primary objective will be to protect the special <del>environmental</del> qualities of that landscape and its setting."	Taken from Submission Document SD14. Included as a main modification in accordance with the Inspector's post hearing advice note. Modification proposed in response to the representation made by Natural England during the 2017 modifications consultation.	<b>No change to SA findings:</b> The additional policy wording relating to protected landscapes reinforces the significant positive (+3) effect already identified in relation to SA objective A (natural environment) for policy S9.
MM08	S9: Environment	48	Amend criterion f) as follows: "The protection and enhancement of designated sites of international, national and local biodiversity and geodiversity importance. On both designated and undesignated sites, development will support opportunities for protecting and enhancing species populations and linking habitats. <b>If significant harm resulting from development cannot be avoided providing impacts should be adequately</b>	Taken from Submission Document SD14. Included as a main modification in accordance with the Inspector's post hearing advice note. Modification proposed in response to the representation made by Natural England during the 2017 modifications consultation and to reflect the hierarchy in NPPF para 118.	<b>No change to SA findings:</b> The proposed amendments to the wording of the policy criterion do not affect the overall meaning of policy S9. While the proposed change provides stronger mitigation in relation to the protection and enhancement of designated biodiversity sites, a significant positive (+3) effect on SA objective A (natural environment) has already been identified for this policy.

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<del>mitigated mitigation and</del> . Compensation measures <b>will only be considered</b> where appropriate <b>as a last resort;</b> and"		
MM09	S11: Cullompton	52	Amend criterion a) as follows: "Make any necessary <del>improvements to the M5 motorway including junction 28 strategic mitigations</del> to maintain highway capacity, <del>and</del> safety, <b>integrity, and sustainability including the M5 and local highway network in conjunction with current and relevant infrastructure plans;</b> "	Amendment agreed within Statement of Common Ground (SCG-10) between MDDC, Devon County Council and Highways England.	<b>No change to SA findings:</b> The proposed amendment to the wording of the policy criterion does not affect the overall meaning of policy S11 or its likely effects on the SA objectives.
MM10	S12: Crediton	55	Add to the end of clause e) " , <b>including green infrastructure</b> "	Taken from Submission Document SD14. Included as a main modification in accordance with the Inspector's post hearing advice note. Modification proposed in response to the representation made by Natural England during the 2017 modifications consultation.	<b>No change to SA findings:</b> The additional reference to green infrastructure will strengthen the mitigation which has already been identified to reduce the original significant negative (-3) effect on SA objective A (natural environment) to minor negative (-1).
MM11	S14: Countryside and paragraph 2.82	59	Amend criterion a) as follows: "a) Affordable and low cost housing to meet local needs, <b>gypsy and traveller accommodation,</b> <del>gypsy and traveller accommodation,</del> residential conversion of appropriate existing buildings..."  Amend the last two sentences of supporting text in para 2.82 as follows:  "National policy requires that new sites for	In response to the Inspector's post hearing advice note:  "Make Policy S14 permissive of G&T sites in the countryside while decoupling allocated G&T sites from general housing allocations and deleting the stipulation in relation to need in Policy DM7"	<b>No change to SA findings:</b> The proposed modification to policy S14 could mean that Gypsy and Traveller sites are more likely to come forward in the countryside; however the policy already sets out criteria against which all proposals in the countryside will be assessed, and which should help to ensure that they are appropriate and do not have negative sustainability effects, i.e. as a result

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			travellers should be <del>very strictly</del> limited in open countryside that is away from existing settlements or outside areas allocated in the development plan. In certain circumstances the development of such sites outside of settlement limits will be appropriate, providing it can meet the criteria set out within Policy DM7 (gypsy and traveller accommodation)."		of adverse impacts on biodiversity, the landscape or cultural heritage. It is also noted that policy DM7 sets out criteria against which proposals for Gypsy and Traveller sites will be assessed and the implications of proposed modifications to that policy are considered separately below (see MM48). The number of Gypsy and Traveller sites that could come forward in the countryside would be very small; therefore the overall neutral (0) effect already identified for policy S14 in relation to SA objective G (meeting housing needs) is unchanged.
MM12	TIV3: Eastern Urban Extension Environmental Protection and Green Infrastructure	70	Amend criterion e) as follows: "Appropriate provision of sewerage system to serve the development <del>and a Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance</del> ;"	Taken from Submission Document SD14. Included as a main modification in accordance with the Inspector's post hearing advice note. Modification proposed following the 2015 Proposed Submission consultation in response to request by the Environment Agency. Reference to Sustainable Urban Drainage is now included in criterion f).	<b>No change to SA findings:</b> The proposed amendment to the wording of policy criterion e does not affect the overall meaning of policy TIV3, as reference to SuDS remains included in the policy within criterion f. Therefore, the mitigation which was previously found to change the originally significant negative (-3) effect on SA objective C (climate change) to minor positive (+1), is unaffected.
MM13	TIV4: Eastern Urban Extension Community Facilities	72	Add additional policy criterion as follows: <b><u>"f) Contributions towards a new recycling centre to serve Tiverton"</u></b>	Modification proposed following Devon County Council's hearing statement, and MDDC's acceptance of Devon County Council's position at the hearings.	<b>No change to SA findings:</b> The proposed additional policy criterion will help to facilitate recycling, which will benefit SA objective D

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
					<p>(safeguarding and minimising resource use). A significant negative (-3) effect was previously identified for the Tiverton Eastern Urban Extension policies (TIV1-5); however this is mainly due to the fact that the large new site would be built on high quality agricultural land within the greenfield site. The potential benefits of the additional policy criterion relating to waste management do not affect this overall significant negative effect. A positive (+2) effect was already identified in relation to SA objective I (infrastructure) which is also unchanged.</p> <p>The likely effects of any new recycling centre on the rest of the SA objectives cannot be assessed at this stage as they would depend on its location and design. However, in general the effects of a new recycling facility may include potential negative impacts on SA objectives A (natural environment) and B (built environment) depending on the location of the site in relation to biodiversity features; heritage features and areas of high landscape sensitivity. There may also be an increase in traffic movements, with associated negative effects on SA objective C (climate change), although the amount of vehicle traffic</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
					generated is unlikely to be significant from a single facility. It is assumed that any proposal would be subject to detailed assessment at the planning application stage, and would be subject to relevant development management policies within the Local Plan Review, which would help to mitigate any adverse effects.
MM14	TIV4: Eastern Urban Extension Community Facilities	72	Replace criterion b) as follows:  " <del>Construction cost for one primary school of 410 places and early years provision</del> <u>Provision of a 420-place primary school with early years provision and a children's centre service delivery base funded by appropriate contributions from developers;</u> "	Modification proposed following Devon County Council's hearing statement, and MDDC's acceptance of Devon County Council's position at the hearings.	<b>No change to SA findings:</b> The proposed amendment to the wording of the policy criterion reinforces the already positive (+2) effects that were identified in relation to SA objective H (community health and wellbeing) and I (infrastructure).
MM15	TIV15: Tiverton Infrastructure	83	Add additional policy criterion as follows:  <u>"I) Provision of a replacement recycling centre facility"</u> .	Modification proposed following Devon County Council's hearing statement, and MDDC's acceptance of Devon County Council's position at the hearings.	<b>No change to SA findings:</b> The proposed additional policy criterion will help to facilitate recycling, which will benefit SA objective D (safeguarding and minimising resource use). A significant negative (-3) effect was previously identified for the Tiverton Eastern Urban Extension policies (TIV1-5); however this is mainly due to the fact that the large new site would be built on high quality agricultural land within the greenfield site. The potential benefits of the additional policy criterion

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
					<p>relating to waste management do not affect this overall significant negative effect. A positive (+2) effect was already identified in relation to SA objective I (infrastructure) which is also unchanged.</p> <p>The likely effects of any new recycling centre on the rest of the SA objectives cannot be assessed at this stage as they would depend on its location and design. However, in general the effects of a new recycling facility may include potential negative impacts on SA objectives A (natural environment) and B (built environment) depending on the location of the site in relation to biodiversity features; heritage features and areas of high landscape sensitivity. There may also be an increase in traffic movements, with associated negative effects on SA objective C (climate change), although the amount of vehicle traffic generated is unlikely to be significant from a single facility. It is assumed that any proposal would be subject to detailed assessment at the planning application stage, and would be subject to relevant development management policies within the Local Plan Review, which would help to mitigate any adverse effects.</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
MM16	TIV16: Blundells School	84	<p>Add additional criterion as follows:</p> <p><b><u>"k) The creation of additional/compensatory floodplain should secure wider environmental and sustainability benefits."</u></b></p> <p>Amend paragraph 3.60c to insert at the end of the sentence "<b><u>subject to the provision of wider environmental and sustainability benefits"</u></b>."</p>	<p>Taken from Submission Document SD14. Included as a main modification in accordance with the Inspector's post hearing advice note. Modification proposed to reflect the representation made by the Environment Agency (6734) which notes that this is a key consideration of the Environment Agency when consulted on development within the floodplain.</p>	<p><b>No change to SA findings:</b> The additional policy criterion will reinforce the positive (+2) effects already identified in relation to SA objectives A (natural environment) and C (climate change) for policy TIV16.</p>
MM17	Paragraph 3.70	89	<p>Amendment to proposed modified text within paragraph 3.70 as follows:</p> <p>"Traffic management measures on Willand Road and Tiverton Road will also be required. Devon County Council queue length monitoring at junction 28 of the M5 motorway indicates congestion at the AM peak. The development will need to mitigate its impact on the junction's capacity through implementation of <b><u>an improvement scheme, either to the existing junction or in the form of more extensive junction improvement works involving a second overbridge required in connection with development east of Cullompton under policy CU7 of the Cullompton Town Centre Relief Road.</u></b>"</p>	<p>Amendment agreed within Statement of Common Ground (SCG-10) between MDDC, Devon County Council and Highways England.</p>	<p><b>No change to SA findings:</b> The proposed amendment to the supporting text does not affect the overall meaning of policy CU1 or its likely effects on the SA objectives.</p>
MM18	CU2: North West Cullompton Transport Provision	90	<p>Amendment to criterion (h) as follows:</p> <p><b><u>"Financial contributions towards Capacity improvements at Junction 28 of the M5, to deliver a strategic highway</u></b></p>	<p>Amendment agreed within Statement of Common Ground (SCG-10) between MDDC, Devon County Council and Highways England.</p>	<p><b>No change to SA findings:</b> The proposed amendment to the wording of the policy criterion does not affect the overall meaning of policy CU2 or</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<b><u>improvement as demonstrated by capacity studies completed to assess the impact of the traffic generated from the site.</u></b>		its likely effects on the SA objectives.
MM19	Paragraph 3.75	90	Amendment to proposed modified text within paragraph 3.75 as follows:  "The Development will need to mitigate its impact upon capacity at junction 28 of the M5 <del>by financial contributions towards junction improvements.</del> "	Amendment agreed within Statement of Common Ground (SCG-10) between MDDC, Devon County Council and Highways England.	<b>No change to SA findings:</b> The proposed amendment to the wording of the supporting text does not affect the overall meaning of policy CU2 or its likely effects on SA objectives.
MM20	CU4: North West Cullompton Community Facilities	93	Replace criterion b) as follows:  <del>"Construction costs for 300 places that arise from the development to contribute to a 420 place primary school with provision for early years; Provision of a 420-place school with early years provision and a children's centre service delivery base funded by appropriate contributions from developers."</del>	Modification proposed following Devon County Council's hearing statement, and MDDC's acceptance of Devon County Council's position at the hearings.	<b>No change to SA findings:</b> The proposed amendment to the wording of the policy criterion does not affect the positive (+2) effect already identified in relation to SA objective I (infrastructure). While the policy now makes reference to the provision of a children's centre service delivery base, a positive (+2) effect was already identified in relation to SA objective H (community health and wellbeing).
MM21	CU4: North West Cullompton Community Facilities	93	Add additional policy criterion as follows:  <b><u>"e) Contributions towards a new recycling centre to serve Cullompton"</u></b>	Modification proposed following Devon County Council's hearing statement, and MDDC's acceptance of Devon County Council's position at the hearings.	<b>No change to SA findings:</b> The proposed additional policy criterion will help to facilitate recycling, which will benefit SA objective D (safeguarding and minimising resource use). A significant negative (-3) effect was previously identified for the Cullompton North West policies (CU1-6); however this is

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
					<p>mainly due to the fact that the large new site would be built on high quality agricultural land within the greenfield site. The potential benefits of the additional policy criterion relating to waste management do not affect this overall significant negative effect. A positive (+2) effect was already identified in relation to SA objective I (infrastructure) which is also unchanged.</p> <p>The likely effects of any new recycling centre on the rest of the SA objectives cannot be assessed at this stage as they would depend on its location and design. However, in general the effects of a new recycling facility may include potential negative impacts on SA objectives A (natural environment) and B (built environment) depending on the location of the site in relation to biodiversity features; heritage features and areas of high landscape sensitivity. There may also be an increase in traffic movements, with associated negative effects on SA objective C (climate change), although the amount of vehicle traffic generated is unlikely to be significant from a single facility. It is assumed that any proposal would be subject to detailed assessment at the planning application stage, and would be</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
					subject to relevant development management policies within the Local Plan Review, which would help to mitigate any adverse effects.
MM22	CU6: North West Cullompton Phasing	95	<p>Replacement policy text for criterion (i) of the policy as follows:</p> <p><del>Provision of M5 access improvements before any dwellings are occupied and thereafter broadly in step with development. Occupation of no more than 600 dwellings prior to the completion of the Cullompton Town Centre Relief Road</del></p>	Amendment agreed within Statement of Common Ground (SCG-10) between MDDC, Devon County Council and Highways England.	<b>No change to SA findings:</b> The proposed amendment to the wording of the policy criterion does not affect the positive (+2) effect already identified in relation to SA objective I (infrastructure) as the policy will still require housing delivery to be phased in line with the delivery of road infrastructure.
MM23	Paragraph 3.94	96	<p>Amendment to proposed modified text within paragraph 3.94 as follows:</p> <p><del>“Devon County Council queue length monitoring at junction 28 of the M5 motorway indicates congestion at the AM peak. The development will need to mitigate its impact upon the junction’s capacity through implementation of an improvement scheme, either to the existing junction or in the form of more extensive junction improvement works involving a second overbridge required in connection with development east of Cullompton under Policy CU7. No more than 600 dwellings should be occupied before the Cullompton Town Centre Relief Road is completed and open to traffic. The provision of the Town</del></p>	Amendment agreed within Statement of Common Ground (SCG-10) between MDDC, Devon County Council and Highways England.	<b>No change to SA findings:</b> The proposed amendments to the supporting text reflect the changes that are proposed to policy CU6, which are considered separately above in terms of their implications for the SA findings.

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<b><u>Centre Relief Road provides increased capacity at J28 M5.</u></b>		
MM24	CU7: East Cullompton	97	Amendment to criterion (f) as follows:  "f) <del>Transport provision to ensure appropriate accessibility for all modes, including a new or improved access and egress onto the M5 motorway</del> <b><u>Provision of transport improvements to ensure safe and suitable access for all modes, including necessary capacity improvements to M5 Junction 28</u></b> and pedestrian and cycle links across the motorway to the existing town;"	Amendment agreed within Statement of Common Ground (SCG-10) between MDDC, Devon County Council and Highways England.	<b>No change to SA findings:</b> The proposed amendment to the wording of the policy criterion does not affect the overall meaning of policy CU7 or its likely effects on the SA objectives.
MM25	CU8: East Cullompton Transport Provision	99	Replacement policy text for criterion (a) of the policy as follows:  <del>Provision of mitigation measures to ensure only acceptable impacts occur to J28 of the M5 as a result of traffic generated from the site</del> <b><u>Capacity improvements at junction 28 M5 to deliver a strategic highway improvement as demonstrated by capacity studies completed to assess the impact of the traffic generated from the site;</u></b>	Amendment agreed within Statement of Common Ground (SCG-10) between MDDC, Devon County Council and Highways England.	<b>No change to SA findings:</b> The proposed amendment to the wording of the policy criterion does not affect the overall meaning of policy CU8. The positive (+2) effect previously identified in relation to SA objective I (infrastructure) is unchanged.
MM26	CU10: East Cullompton Community Facilities	102	Amend criterion a) as follows:  a) <del>A site of 2.5 hectares for a new primary school at no cost to the Local Education Authority</del> <b><u>A serviced site of 2.5ha for a new</u></b>	Modification proposed following Devon County Council's hearing statement, and MDDC's acceptance of Devon County Council's position at the hearings.	<b>No change to SA findings:</b> The proposed amendment to the wording of the policy criterion does not affect the overall meaning of policy CU10. The already positive (+2) effect

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<p><b><u>630 place primary school, or alternatively 3ha of serviced land in two parcels of 1.1ha and 1.9ha appropriately located for the delivery of two new primary schools, at no cost to the Local Education Authority;</u></b></p> <p>Amend criterion c) as follows:</p> <p><del>“Construction costs for a 650 place primary school or two 325 place primary schools, including provision for early years education. Construction costs for a primary school capacity of for at least 630 places plus additional early years provision, including the requisite land to deliver these facilities. The required primary school capacity should be delivered through the provision of either one or two schools;”</del></p>		<p>identified in relation to SA objective I (infrastructure) is unchanged.</p>
MM27	CU10: East Cullompton Community Facilities	102	<p>Add additional policy criterion as follows:</p> <p><b><u>“g) Contributions towards a new recycling centre to serve Cullompton”</u></b></p>	<p>Modification proposed following Devon County Council’s hearing statement, and MDDC’s acceptance of Devon County Council’s position at the hearings.</p>	<p><b>No change to SA findings:</b> The proposed additional policy criterion will help to facilitate recycling, which will benefit SA objective D (safeguarding and minimising resource use). A significant negative (-3) effect was previously identified for the East Cullompton policies (CUL7-12); however this is mainly due to the fact that the large new site would be built on greenfield land, some of which is of the highest agricultural quality. The potential benefits of the additional policy criterion relating to waste</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
					<p>management do not affect this overall significant negative effect. A positive (+2) effect was already identified in relation to SA objective I (infrastructure) which is also unchanged.</p> <p>The likely effects of any new recycling centre on the rest of the SA objectives cannot be assessed at this stage as they would depend on its location and design. However, in general the effects of a new recycling facility may include potential negative impacts on SA objectives A (natural environment) and B (built environment) depending on the location of the site in relation to biodiversity features; heritage features and areas of high landscape sensitivity. There may also be an increase in traffic movements, with associated negative effects on SA objective C (climate change), although the amount of vehicle traffic generated is unlikely to be significant from a single facility. It is assumed that any proposal would be subject to detailed assessment at the planning application stage, and would be subject to relevant development management policies within the Local Plan Review, which would help to mitigate any adverse effects.</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
MM28	CU12: East Cullompton Phasing	104	Replacement policy text for criterion (f) as follows:  f) <del>Provision of the first phase of comprehensive M5 access improvements before any dwellings are occupied, followed by strategic highways infrastructure broadly in step with development</del> <b>Capacity improvements at junction 28 M5 to deliver a strategic highway improvement as demonstrated by capacity studies completed to assess the impact of the traffic generated from the site;</b> and	Amendment agreed within Statement of Common Ground (SCG-10) between MDDC, Devon County Council and Highways England.	<b>No change to SA findings:</b> The proposed amendment to the wording of the policy criterion does not affect the overall meaning of policy CU12. The positive (+2) effect previously identified in relation to SA objective I (infrastructure) is unchanged.
MM29	Paragraph 3.116	105	Delete penultimate sentence within paragraph 3.116 of the supporting text as follows:  <del>"The first phase referred to in criterion (f) above therefore only relates to the subsequent highway works set out in the Devon County Council Report."</del>	Amendment agreed within Statement of Common Ground (SCG-10) between MDDC, Devon County Council and Highways England.	<b>No change to SA findings:</b> The proposed amendment to the wording of the supporting text does not affect the overall meaning of policy CU12, changes to which are considered separately above and below in terms of their implications for the SA findings.
MM30	CU12: East Cullompton Phasing	106	Paragraph 3.120, amend as follows: "Subject to viability, affordable housing will be provided at a rate of approximately <del>25%</del> <b>28%</b> , in step with the market housing".	Taken from Submission Document SD14. Included as a main modification in accordance with the Inspector's post hearing advice note. Modification proposed to correct typographical error and to ensure supporting text is consistent with policy.	<b>No change to SA findings:</b> The proposed amendment to the wording of the policy criterion is to correct a typographical error and does not affect the significant positive (+3) effect already identified in relation to SA objective G (meeting housing needs).

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
MM31	CU17: Week Farm	110	Replacement policy text for proposed criterion (g) as follows:  (g) " <del>Provision of M5 access improvements before any commercial floorspace is brought into use</del> <b>Capacity improvements at junction 28 M5 to deliver a strategic highway improvement as demonstrated by capacity studies completed to assess the impact of the traffic generated from the site;</b> "	Amendment agreed within Statement of Common Ground (SCG-10) between MDDC, Devon County Council and Highways England.	<b>No change to SA findings:</b> The proposed amendment to the wording of the policy criterion does not affect the overall meaning of policy CU17 and is made to reflect the latest evidence regarding infrastructure requirements for the site. The neutral (0) post-mitigation effect previously identified in relation to SA objective I (infrastructure) is therefore unchanged.
MM32	CU18: Venn Farm	111	Replacement policy text for proposed criterion (g) as follows:  (g) " <del>Provision of M5 access improvements before any commercial floorspace is brought into use</del> <b>Capacity improvements at junction 28 M5 to deliver a strategic highway improvement as demonstrated by capacity studies completed to assess the impact of the traffic generated from the site;</b> "	Amendment agreed within Statement of Common Ground (SCG-10) between MDDC, Devon County Council and Highways England.	<b>No change to SA findings:</b> The proposed amendment to the wording of the policy criterion does not affect the overall meaning of policy CU18 and is made to reflect the latest evidence regarding infrastructure requirements for the site. The neutral (0) post-mitigation effect previously identified in relation to SA objective I (infrastructure) is therefore unchanged.
MM33	Paragraph 3.143a	114	Amend paragraph 3.143a as follows:  "...the final scheme will need to incorporate design solutions which mitigate such impacts. <b>Any loss of floodplain at this location should be mitigated by the creation of additional/compensatory floodplain which should secure wider environmental and sustainability</b>	Taken from Submission Document SD14. Included as a main modification in accordance with the Inspector's post hearing advice note. Modification proposed in response to the representation made by the Environment Agency during the 2017 modifications consultation.	<b>No change to SA findings:</b> The proposed amendment to the wording of the supporting text does not affect the overall meaning of policy CU19. It will provide some additional mitigation for the effects of the policy in relation to SA objective C (climate change) but is not considered to change the positive (+2) effect that

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<b><u>benefits including the provision of appropriate ecological and biodiversity enhancements.</u></b>		has already been identified post-mitigation. The modification could also provide some additional mitigation for the impacts of policy CU19 on SA objective A (natural environment) although the reference to ecological and biodiversity enhancements is not considered to change the overall negative (-2) score identified previously.
MM34	CU20: Cullompton Infrastructure	114	Add additional policy criterion as follows: <b><u>"n) Provision of a replacement recycling centre facility"</u></b> .	Modification proposed following Devon County Council's hearing statement, and MDDC's acceptance of Devon County Council's position at the hearings.	<b>Change to SA findings:</b> The proposed additional policy criterion will help to facilitate recycling, which will benefit SA objective D (safeguarding and minimising resource use). A minor positive (+1) effect was previously identified on SA objective D for policy CU20 as the site identified for the railway station is on brownfield land. <b>The addition of a new policy criterion relating to a replacement recycling facility would increase this to a positive (+2) effect.</b> The already significant positive (+3) effect on SA objective I (infrastructure) is unchanged.  The likely effects of any replacement recycling centre on the rest of the SA objectives cannot be assessed at this stage as they would depend on its location and design. However, in general the effects of a new recycling facility may include potential negative

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
					<p>impacts on SA objectives A (natural environment) and B (built environment depending on the location of the site in relation to biodiversity features; heritage features and areas of high landscape sensitivity. There may also be an increase in traffic movements, with associated negative effects on SA objective C (climate change), although the amount of vehicle traffic generated is unlikely to be significant from a single facility. It is assumed that any proposal would be subject to detailed assessment at the planning application stage, and would be subject to relevant development management policies within the Local Plan Review, which would help to mitigate any adverse effects.</p>
MM35	CU21: Land at Colebrook	115	<p>Remove contingency status. Modifications proposed as follows:</p> <p>Land at Colebrook <del>CONTINGENCY SITE</del></p> <p>A site of 4.8 hectares at Colebrook <del>is identified as a contingency site allocated</del> for residential development <del>to be released in accordance with Policy S4,</del> subject to the following:</p> <ul style="list-style-type: none"> <li>a) 100 dwellings with 28% affordable housing;</li> <li>b) <del>The development shall not commence until</del> <del>the Town Centre</del></li> </ul>	<p>Contingency status removed in response to the Inspector's post hearing advice note.</p> <p>Devon County Council has advised the timing of the development of the site is not dependent on the Cullompton Town Centre Relief Road coming forward as long as financial contributions are made towards the delivery of the relief road. Please refer to the updated housing land supply statement.</p> <p>Criterion b) deleted following Devon County Council's highway consultation</p>	<p><b>Change to SA findings:</b> The removal of the contingency status of this site does not change its likely effects on the SA objectives; however, <b>the effects previously identified would be more certain to occur. Effects may also occur earlier in the Plan period</b> now that the allocation of the site is no longer dependent on the relief road. A likely significant positive (+3) effect was identified in relation to SA objective G (meeting housing needs) but no likely significant negative effects were</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<p><del>Relief Road has been provided; completion of the North West Cullompton through route linking Tiverton Road to Willand Road and provision of the first phase of comprehensive M5 access improvements;</del></p> <ul style="list-style-type: none"> <li>c) Provision of two points of access from Siskins Chase;</li> <li>d) Provisions of 1.1 hectares of green infrastructure, to include the retention of land in the floodplain as informal amenity open space and for Sustainable Urban Drainage provision;</li> <li>e) Measures to protect and enhance trees, hedgerows and other environmental features which contribute to the character and biodiversity, maintaining a wildlife network within the site and linking to the surrounding countryside;</li> <li>f) Archaeological investigation and appropriate mitigation; and</li> <li>g) Transport assessment and implementation of travel plans and other measures to minimise carbon footprint and air quality impacts.</li> </ul> <p>Delete paragraph 3.148 from the supporting text.</p> <p>Delete penultimate sentence from paragraph 3.149 as follows:</p> <p><del>"Site commencement will also need to be deferred until after the completion of the through route linking Willand Road to Tiverton Road, which is being</del></p>	<p>response to MDDC in March 2019, to the current planning application reference 19/00118/MOUT (outline application for up to 105 dwellings on land at Colebrook Lane). Devon County Council has updated its previous highways advice and there is no longer a requirement for the prior completion of the North West Cullompton distributor road (Tiverton Road to Willand Road link).</p>	<p>identified.</p> <p>The removal of the criterion relating to the timing of the development in relation to road infrastructure does not affect the SA findings. The removal of this criterion reflects the latest evidence regarding the requirements for infrastructure to support the development.</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<p><del>provided as part of the North West Cullompton allocation.</del></p> <p>Modify the Policies Map as shown on Plan MM35.</p>		
MM36	Paragraph 3.149	116	<p>Amend paragraph 3.149 of the supporting text as follows:</p> <p>3.149 <del>If this site comes forward for development, it must contribute to the provision of offsite highways infrastructure.</del> Development in this location has the potential to place pressure on the capacity of both the strategic and local road network. <del>Devon County Council has therefore stipulated that development should only take place providing there is sufficient network capacity. If released, the site will need to be phased to come forward after further M5 access improvements are implemented.</del> Any application for development must undertake an assessment of the impact of the proposal on both the capacity of the local road network and Junction 28 of the M5 and permission will only be granted where there are no significant adverse impacts <b>which cannot be mitigated.</b> Site commencement will also need to be deferred until after the completion of the through route linking Willand Road to Tiverton Road, which is being provided as part of the North West Cullompton allocation. The site is expected to contribute to the provision of off-<b>site</b> highways infrastructure. <del>Development in</del></p>	<p>Amendment agreed within Statement of Common Ground (SCG-10) between MDDC, Devon County Council and Highways England.</p> <p>Further amendment to remove the words "...which cannot be mitigated" to improve clarity.</p>	<p><b>No change to SA findings:</b> The proposed amendments to the supporting text reflect the changes to policy CU21, which are considered separately above in terms of their implications for the SA findings.</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<p><del>this location would increase traffic through the town centre, so would not be permissible until the Town Centre Relief Road has been provided, offering an alternative route.</del> The development would also be expected to provide two points of access from Siskins Chase.</p>		
MM37	CRE5: Pedlerspool, Exhibition Road	121	<p>Amendment to criterion (b) to include reference to "<b><u>with early years provision and children's centre service delivery base</u></b>".</p>	<p>Modification proposed following Devon County Council's hearing statement, and MDDC's acceptance of Devon County Council's position at the hearings.</p>	<p><b>No change to SA findings:</b> The fact that the new primary school is to include early years provision and a children's centre service delivery base will have a positive effect on local health and wellbeing as such centres will provide services such as baby clinics and other family support. A positive (+2) effect was already identified for this policy in relation to SA objective H (community health and wellbeing). It is assumed that any additional trip generation is likely to be minimal and is not considered to affect the SA objectives.</p>
MM38	J27: Land at Junction 27 of the M5 Motorway	128	<p>Replace criterion b) as follows: <b><u>"Provision of transport improvements to ensure appropriate accessibility for all modes, including new or improved access and egress onto the M5 motorway and pedestrian and cycling link across the motorway to Tiverton Parkway Railway Station. Provision of transport improvements to ensure safe and suitable access for all modes,</u></b></p>	<p>Amendment agreed within Statement of Common Ground (SCG-10) between MDDC, Devon County Council and Highways England.</p>	<p><b>No change to SA findings:</b> The proposed amendment to the wording of the policy criterion does not affect the overall meaning of policy J27 and is made to reflect the latest evidence regarding infrastructure requirements for the site.</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<b><u>including necessary capacity improvements to M5 Junction 27 and pedestrian and cycling link across the motorway to Tiverton Parkway Railway Station</u></b>		
MM39	J27: Land at Junction 27 of the M5 Motorway and paragraph 3.184d	128	<p>Delete criterion e):</p> <p><del>“Prior to the approval of any planning permission for the site any required mitigation measures for the Culm Grasslands Special Area of Conservation shall be identified and agreed together with a time scale for their provision and a mechanism for their maintenance.”</del></p> <p>Para3.184d, amend as follows:</p> <p>“The proposals for a major facility of this nature needs to be considered carefully in terms of its impacts and the policy makes provision for detailed transport assessments, environmental protection and green infrastructure, energy conservation, provision of improved public transport, pollution and drainage considerations, phasing and importantly, master planning with full public consultation prior to any planning applications being approved. <b><u>Any loss of floodplain at this location should be mitigated by the creation of additional/compensatory floodplain which should secure wider environmental and sustainability benefits including provision of</u></b></p>	<p>Taken from Submission Document SD14. Included as a main modification in accordance with the Inspector’s post hearing advice note. Deletion of the reference to mitigation measures with regard to the Culm Grasslands Special Area of Conservation to reflect the latest evidence in the J27 proposals: Habitat Regulations Assessment Appropriate Assessment Report (2016) and representation made by Natural England (6242). Reference to floodplain in response to representation made by the Environment Agency (6734) to the 2017 modifications consultation.</p>	<p><b>No change to SA findings:</b> The deletion of criterion ‘e’ is proposed to reflect the latest evidence regarding the likely impacts of the J27 development on the Culm Grasslands SAC. The HRA for the Local Plan Review has concluded that the J27 proposal would not have an adverse effect on the integrity of the SAC and therefore reference to mitigation is no longer required. The minor negative (-1) effect previously identified for this policy in relation to SA objective A (natural environment) is unchanged as the score was based on other factors as well as potential impacts on the SAC, i.e. potential landscape impacts from a development of this scale.</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<b>appropriate ecological and biodiversity enhancement.</b> Section 106 planning obligations will also make provision for any necessary infrastructure and public transport improvements <del>and would need to ensure appropriate mechanisms are in place to ensure that the integrity of the Culm Grasslands SAC will not be adversely affected."</del>		
MM40	J27: Land at Junction 27 of the M5 Motorway	128	Include additional criterion in policy as follows:  <b>"a) Any planning application which includes a 'designer outlet shopping centre' should be accompanied by a full Retail and Leisure Impact Assessment"</b> .	Taken from Submission Document SD14. Included as a main modification in accordance with the Inspector's post hearing advice note. Modification proposed to ensure the potential impact is appropriately and adequately assessed at the planning application stage. Amendment also reflects comments made by The Crown Estate and TH Real Estate c/o Montagu Evans (6234).	<b>No change to SA findings:</b> The requirement for a retail and leisure impact assessment to accompany any application for a designer outlet shopping centre will reinforce the already significant positive (+3) effect previously identified for this policy in relation to SA objective E (economic growth and employment).
MM41	J27: Land at Junction 27 of the M5 Motorway Paragraph 3.184d	129	Include the following text at the end of the paragraph 3.184d:  <b>"Priority habitats exist within the site and in line with criterion c) of Policy J27 should be protected and enhanced."</b>	Amendment as agreed with Natural England (see Statement of Common Ground SCG-6 MDDC and Natural England)	<b>No change to SA findings:</b> The proposed amendment to the supporting text involves cross referring to criterion c within policy J27 itself, which is unchanged.
MM42	SP2: Higher Town Sampford Peverell	146	Amend Policy SP2 as follows:  "A site of 6 hectares at Higher Town, Sampford Peverell is allocated for a low density residential development, <del>to come forward following the commencement of development of the M5 Junction 27</del>	In response to the Inspector's post hearings advice note:  "...Given that the Policy SP2 allocation is designed to address part of that overall housing requirement, the tie serves no purpose. Reference to it should be	<b>Change to SA findings:</b> The proposed amendment to policy SP2 does not change the likely effects of this site on the SA objectives; however, bringing forward the delivery of the site would mean that <b>the effects previously identified</b>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<del>allocation,</del> subject to the following:"	removed."	<b>would occur earlier in the Plan period.</b> No likely significant effects, either positive or negative, were identified for this site allocation post-mitigation.
MM43	SP2: Higher Town, Sampford Peverell and paragraph 3.224c	146	<p>Delete criterion b) and re-label the remaining criteria accordingly.</p> <p><del>b) No development until the completion of improved access works to the A361;</del></p> <p>Delete paragraph 3.224c of the supporting text.</p> <p><del>3.224c The Highway Authority has advised that any development of the site should only commence once improvements to the A361 junction at Sampford Peverell have been implemented to create west facing slip roads to enable direct access to and from the west. The site is required to meet additional housing need arising from the allocation at Junction 27 of the M5 motorway. Accordingly it shall only come forward following the commencement of development on that site.</del></p>	<p>In response to the Inspector's post hearings advice note:</p> <p>"It was clear from the helpful submissions of the Highway Authority, that the limitation on development until the completion of improved access works to the A361 is unnecessary. Criterion b) needs to be removed."</p>	<p><b>No change to SA findings:</b> The proposed amendment to the wording of the policy criterion does not affect the overall meaning of policy SP2 and is made to reflect the latest evidence regarding infrastructure requirements for the site.</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
MM44	SP2: Higher Town, Sampford Peverell	146	Include new criterion: <b><u>"Improved access to the village for pedestrians and cyclists"</u></b>	Taken from Submission Document SD14. Included as a main modification in accordance with the Inspector's post hearing advice note. Modification proposed to provide greater clarity in response to a number of representations from individuals and through agreement of inclusion of criterion by Devon County Council.	<b>Change to SA findings:</b> The additional reference to pedestrian and cycle access will reinforce the already positive (+2) effect identified in relation to SA objective C (climate change). <b>The previously neutral (0) effect on SA objective H (health and wellbeing) is increased to a minor positive (+1) effect</b> as a result of the additional reference to active travel.
MM45	SP2: Higher Town, Sampford Peverell	146	Amend criterion g) as follows: <b>"2 2.5 hectares of Green Infrastructure laid out and managed with landscaping and open space."</b> <i>Modify the Policies Map as shown on Plan MM45.</i>	Taken from Submission Document SD14. Included as a main modification in accordance with the Inspector's post hearing advice note. The area of Green Infrastructure has been further extended to limit the impact of the setting of the listed building.	<b>No change to SA findings:</b> The increased provision of green infrastructure will reinforce the mitigation which has already been found to reduce an originally uncertain negative (-2/?) effect on SA objective B (built environment) to an uncertain neutral (0/?) effect. The increase in provision from 2 to 2.5ha is not considered to change the neutral effect to positive, taking into account the other elements of the policy.
MM46	DM1: High Quality Design and new paragraph 4.5b	153-154	Insert additional criteria as follows: <b><u>"g) Adequate levels of daylight, sunlight and privacy to private amenity spaces and principal windows;</u></b> <b><u>h) Suitably sized rooms and overall</u></b>	In response to the Inspector's post hearings advice note:  "Criteria a) and c) [of DM12] seem to me to be more about design and might	<b>Change to SA findings:</b> The proposed new criteria are brought into the policy from the now deleted policy DM12. The addition of these criteria to policy DM1 reinforces the already significant positive (+3)

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<p><b><u>floorspace which allows for adequate storage and movement within the building together as set out in the Nationally Described Space Standard with external spaces for recycling, refuse and cycle storage; and</u></b></p> <p><b><u>i) On sites of 10 houses or more the provision of 20% of dwellings built to Level 2 of Building Regulations Part M 'access to and use of dwellings.'</u></b></p> <p>Insert additional supporting text as follows:</p> <p><b><u>"4.5b National policy states that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. This is particularly important for the design of the homes that people live in and the spaces that surround those homes. The aim in Mid Devon is to deliver high quality buildings and spaces that meet the needs of users, taking account of an aging population whilst ensuring compatibility with surrounding development and uses. Though compliance is delivered through buildings regulations, criterion i) will be implemented through a condition attached to the planning permission."</u></b></p>	<p>find a more comfortable home as part of Policy DM1. I take a similar view in relation to criterion b)."</p> <p>"the general size and configuration of a dwelling, and the proper handling of recycling, refuse and cycle storage, are design-based considerations and the reference to the Nationally Described Space Standard seems to be unnecessary.' If these criteria are adjusted to make plain that they refer to the design of new housing, and relocated in Policy DM1, then that would be a more efficient way of dealing with the matter."</p> <p>"I am not convinced that the requirement for 30% of houses on sites of 10 houses or more to be built to Level 2 of Building Regulations Part M has been made out. I believe 20, as a carry forward from the existing policy that refers to Lifetime Homes standards is reasonable but again, this requirement could be moved into Policy DM1."</p> <p>Reference to the Nationally Described Space Standard is retained in the policy. This is since MDDC's experience of applying minimum size standards for decision making purposes on</p>	<p>effects on SA objectives B (built environment) and C (climate change) as well as the positive (+2) effect on SA objective H (health and wellbeing) and <b>increases the positive (+2) effect on SA objective G (meeting housing needs) to significant positive (+3).</b></p> <p>The policy now requires 20% of dwellings on sites of 10 houses or more to be built to Level 2 of Building Regulations Part M 'access to and use of dwellings" where this was previously 30%; however this change is not considered to change the SA effects identified as the policy will still have positive effects in terms of providing a range of accessible housing.</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
				development proposals requires that the Nationally Described Space Standards are explicit in local plan policy.	
MM47	DM2: Renewable and Low Carbon Energy	154	Amend the third sentence in Policy DM2 as follows:  "Proposals must demonstrate that impacts are or can be made acceptable <b>in relation to: and that the development will preserve.</b> "	In response to the Inspector's post hearings advice note:  "I have some concerns about the wording of Policy DM2 because the first part seeks to avoid any significant adverse impacts, but the second part requires renewable and low carbon energy to preserve (which I take to mean cause no harm to) landscape character, the setting of heritage assets, living conditions, and so on. The former is the correct approach and the second part needs to be adjusted to remove the contradiction. This will require a MM."	<b>No change to SA findings:</b> The proposed modification does not affect the overall meaning or purpose of policy DM2, or its likely effects on the SA objectives.
MM48	DM7: Traveller Sites and paragraph 4.29	164-165	Amend Policy DM7 as follows:  <b>1) <u>Planning applications for Pitches and Plots</u></b>  Planning applications for gypsy and traveller pitches, or plots for travelling showpeople, will be permitted where: <del>a) The need cannot be met on another suitable site in Mid Devon which has consent or is allocated for gypsy and traveller pitches;</del> <del>b) Local services can be accessed without the use of a car;</del> a) Suitable onsite facilities will be	In response to the Inspector's post hearings advice note on the provision for Gypsies and Travellers.	<b>No change to SA findings:</b> The additional criteria relating to landscape and ecological impacts and flood risk would reinforce the mitigation which has already been found to reduce a negative (-2) effect on SA objective A (Natural Environment) to minor negative (-1).  The overall number of pitches to be provided is unchanged. While the proposed modifications could mean that Gypsy and Traveller sites are more likely to come forward in the countryside, rather than within the

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<p>provided including space for children’s play;</p> <p>b) The proposal will have suitable environmental quality for residents including non-isolating boundary treatments;</p> <p>c) <b><u>The site will not cause unacceptable landscape or ecological impact and is not located in an area at high risk of flooding;</u></b></p> <p>d) Occupation will be limited to those who meet the Government’s published definition of gypsies and travellers, including travelling showpeople <b><u>or their dependents;</u></b> <b><u>and</u></b></p> <p>e) <b><u>Safe and convenient access to local facilities is provided</u></b></p> <p><del>Where development proposals are considered under S13 “Villages”, local services can be accessed without the use of a car.</del></p> <p><del>Where development proposals are considered under S14, the need cannot be met on another suitable site in Mid Devon which has consent or is allocated for gypsy and traveller pitches.</del></p> <p>Sites with associated employment or storage elements <b><u>may will</u></b> be</p>		<p>larger housing site allocations, any development of this nature would be very small-scale and other policies in the Local Plan Review would still apply, including S14 which is a criteria-based policy relating to all types of development in the countryside.</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<p>permitted where there is specific justification and the location, <b>scale, and nature</b> of the proposed development will not have harmful impacts on local amenity or the local environment. Gypsy and traveller accommodation may be included as part of the affordable housing requirement.</p> <p><b><u>2. Provision on allocated sites</u></b></p> <p><b><u>Gypsy and Traveller pitches on allocated sites (sought by Policies TIV1, CU1, CU7 or CRE5) should be provided on site unless it is demonstrated that off-site provision will achieve a more favourable outcome for Gypsies and Travellers taking into account:</u></b></p> <ul style="list-style-type: none"> <li>i) <b><u>Pitch numbers;</u></b></li> <li>ii) <b><u>Site facilities;</u></b></li> <li>iii) <b><u>Accessibility to services, including health and education;</u></b></li> <li>iv) <b><u>Early delivery of serviced pitches or plots which are available for occupation; and</u></b></li> <li>v) <b><u>The provision of an effective mechanism for delivery.</u></b></li> </ul>		

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<p><b><u>Such sites must also meet the requirements of part 1 of Policy DM7 above.</u></b></p> <p>Amend supporting text in paragraph 4.29 as follows:</p> <p>"4.29 There is a need for 35 new pitches for gypsies and travellers for the period 2014-34, <b><u>and 11 plots for travelling showpeople for the period 2014-34.</u></b> <b><u>The majority of this</u></b> This need is proposed to be met on the largest <b>strategic allocations. The travelling showpeople community is predominately based in one large site at Cullompton, which is at capacity. A need for 11 plots has been identified and the Council is in discussions with a landowner to grant permission for one additional site near to the town which will meet the outstanding requirement. The need for gypsy and traveller accommodation is identified to be in the region of 25 pitches across the plan period. These are to be included within allocated developments at Tiverton Eastern Urban Extension, North West Cullompton, and Pedlerspool in Crediton. <b><u>Pitches must be provided on-site unless the more favourable outcome described by Policy DM7 is demonstrated. Any proposals for more favourable off-site provision must identify and provide serviced sites in accordance with Policy DM7. A clear mechanism to ensure that pitches or</u></b></b></p>		

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<p><b><u>plots are delivered in such a way as to achieve a more favourable outcome for the travelling community must be identified.</u></b></p> <p><b><u>This will usually be through a s106 agreement requiring the developer to identify and obtain planning permission (which will not be unreasonably withheld by the Council) for the required number and standard of pitches. The pitches will be provided by the development itself or where the land is transferred for a nominal value, by an agreed third party Registered Provider or other agreed private provider, for the sole purpose of occupation and ancillary business by Gypsies and Travellers. The off-site provision of pitches must be provided and made available for occupation before the occupation of a specified proportion of the provision of on-site open market dwellings as part of the larger housing proposal at TIV1, CU1, CU7 or CRE5.</u></b> Where gypsy and traveller pitches are provided <b><u>on-site</u></b> on housing allocations, these are to be counted against the affordable housing targets for that site. <b><u>There are also existing consented sites in Mid Devon. Proposals for gypsy and traveller accommodation will not be permitted in other locations, unless it is demonstrated that the existing consented or allocated sites will not be</u></b></p>		

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<del>available to the prospective occupiers in a reasonable timescale."</del>		
MM49	DM12: Housing Standards	170	<p>Delete Policy DM12 Housing Standards (incorporating proposed modifications in the 2017 consultation) and move its content, with amendments in accordance with the Inspector's post hearings advice note, to Policy DM1.</p> <p><b><del>Policy DM12</del></b></p> <p><b><del>Housing Standards</del></b></p> <p><b><del>New housing development should be designed to deliver:</del></b></p> <p><b><del>a) Adequate levels of daylight, sunlight and privacy to private amenity spaces and principal windows;</del></b></p> <p><b><del>b) Suitably sized rooms and overall floorspace which allows for adequate storage and movement within the building together as set out in the Nationally Described Space Standard with external space for recycling, refuse and cycle storage;</del></b></p> <p><b><del>c) Private amenity space that reflects the size, location, floorspace and orientation of the property; and</del></b></p> <p><b><del>d) On sites of 10 houses or more the provision of 30% of</del></b></p>	In response to the Inspector's post hearings advice note. Please refer to MM46.	<p><b>Change to SA findings:</b> The proposed deletion of this policy means that <b>the effects previously identified in the SA will no longer occur as a result of policy DM12.</b> Likely significant positive (+3) effects were previously identified (post-mitigation) in relation to SA objectives B (built environment) and G (meeting housing needs). However, the policy criteria are now proposed to be incorporated into policy DM1; therefore <b>the likely effects will still occur as a result of that policy</b> (as recorded earlier in this table).</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<p><del>dwelling</del>s built to Level 2 of Building Regulations Part M 'access to and use of dwellings'</p>		
MM50	DM19: Protection of Employment Land and paragraph 4.60	179	<p>Delete Policy DM19 criterion c)  <del>e) A sequential viability test has been applied following the unsuccessful marketing of the site, based on the following sequence of testing:</del></p> <ul style="list-style-type: none"> <li><del>i) Mixed use of the site that incorporates an employment-generating use, then</del></li> <li><del>ii) Non-employment use.</del></li> </ul> <p>Amend para 4.60 of the supporting text as follows:  <del>... "If there is no interest in the site as a result of marketing, the potential of the site for mixed use development including employment must be considered in preference to the total loss of employment. This will involve determining whether the site still has the potential to be developed viably for mixed use development or can only be viable if the whole site is developed for non-employment uses. In all cases, the proposed use must not significantly harm any other existing uses in the area, or be harmed by those uses. For</del></p>	<p>In response to the Inspector's post hearings advice note:          "There was some discussion about criterion c) of Policy DM19 which deals with the protection of employment land. In my view, if criterion b is satisfied, and suitable marketing (which might include for mixed use purposes) has taken place at an appropriate price, for at least 18 months without any interest, then an alternative use (which may take the form of a mixed use) should be allowed to come forward. Criterion c) which requires an additional sequential viability test is far too onerous a requirement and should be removed through a MM."          Supporting text deleted to accord with proposed MM.</p>	<p><b>No change to SA findings:</b> The proposed modification makes the policy requirements slightly less stringent; however, this was because the Inspector felt that the other policy criteria already provide appropriate protection for employment sites. The overall meaning of the policy and likely sustainability effects are unchanged.</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<del>example, housing development may not be acceptable in close proximity to general industry, depending on the nature and scale of the industrial use."</del>		
MM51	DM25: Development Affecting Heritage Assets	186	<p>Amend Policy DM25 as follows:</p> <p>"a) Apply a presumption in favour of <b><u>preserving or enhancing all designated preservation in situ in respect of the most important</u></b> heritage assets <b><u>and their settings</u></b>;</p> <p>b) Require development proposals likely to <u>affect the significance of</u> heritage assets <del>and their settings</del>, including new buildings, alterations, extensions, changes of use and demolitions, to consider their significance, character, setting (including views to or from), appearance, design, layout and local distinctiveness, and the opportunities to enhance them;</p> <p>c) Only approve proposals that would <b><u>lead to substantial harm to or total loss of significance of a designated heritage assets where it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss be likely to substantially harm heritage assets and their settings if substantial public benefit outweighs that harm</u></b> or the requirements of <del>paragraph 133</del> of the National Planning Policy Framework are met;</p>	<p>In response to the Inspector's post hearings advice note:</p> <p>"To comply with statute, criterion a) should apply a presumption in favour of preserving or enhancing all designated heritage assets, not just the most important ones. A reference to their setting would assist too".</p> <p>"Criterion b) needs to refer to the significance of heritage assets rather than heritage assets and their settings."</p> <p>"Criterion c) needs to properly reflect the wording of paragraph 133 of the (2012 version of the) Framework by referring to significance. The direct reference to paragraph 133 should be removed because planning applications will be determined using the latest version of the Framework."</p> <p>"Criterion d) should properly reflect paragraph 134 of the (2012) Framework and refer to significance."</p> <p>"Criterion e) could confine itself to `require developers to make a</p>	<p><b>No change to SA findings:</b> The proposed modifications strengthen the mitigation provided by this policy in terms of the potential impacts of new development on the historic environment; however, the SA had already identified a likely significant positive (+3) effect from this policy in relation to SA objective B (built and historic environment).</p>

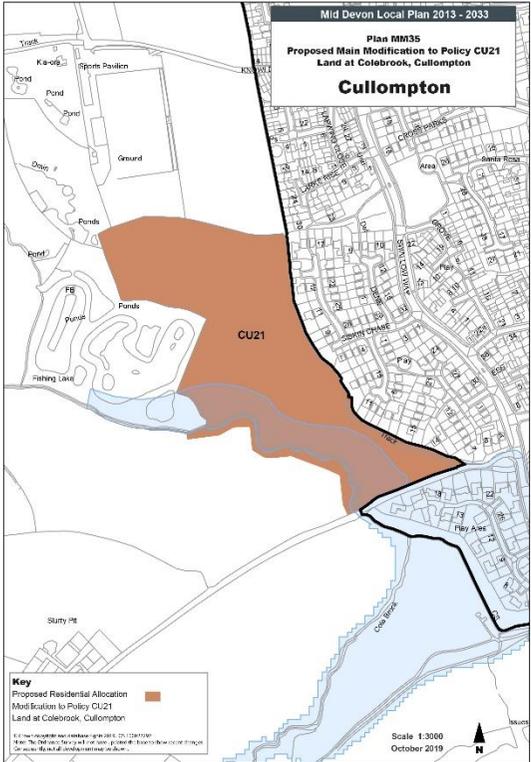
No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<p>d) Where a development proposal <b>would will</b> lead to less than substantial harm <b>to the significance of a designated heritage asset, this that</b> harm <b>will should</b> be weighed against <b>the public benefits of the proposal any public benefit</b>, including securing <b>its</b> optimum viable use; and</p> <p>e) Require developers to make a proportionate but systematic assessment of <b>the any</b> impact on <b>the</b> setting <b>and thereby the significance of heritage asset(s) down in the guidance from</b> <del>English Heritage: "The Setting of Heritage Assets"</del> <del>Historic England: "The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning: 3."</del></p>	<p>proportionate and systematic assessment of any impact on the setting and thereby the significance of heritage asset(s)' Pointing to HE guidance in the manner proposed seems to me to run the risk of that guidance changing."</p>	
MM52	Paragraph 4.88	189	<p>Amend paragraph 4.88 as follows:</p> <p>... "Green Infrastructure functions can coexist in one place, so the land coverage does not have to be extensive in every case, <b>although developments should recognise that floodplain cannot necessarily provide year-round amenity access."</b></p>	<p>Taken from Submission Document SD14. Included as a main modification in accordance with the Inspector's post hearing advice note. Modification proposed following representation made by the Environment Agency (673) which provides greater clarity of the ability of floodplain to be considered as Green Infrastructure but with limitations of year-round amenity access.</p>	<p><b>No change to SA findings:</b> The proposed modification relates to the supporting text to policy DM26, but the overall meaning of the policy and the policy text are unchanged.</p>
MM53	Paragraph 4.88	189	<p>At the end of paragraph 4.88 include the following sentence:</p> <p><b>"Development incorporating green infrastructure will be required to</b></p>	<p>Taken from Submission Document SD14. Included as a main modification in accordance with the Inspector's post hearing advice note. Modification proposed following the representation</p>	<p><b>No change to SA findings:</b> The proposed modification relates to the supporting text to policy DM26, but the overall meaning of the policy and</p>

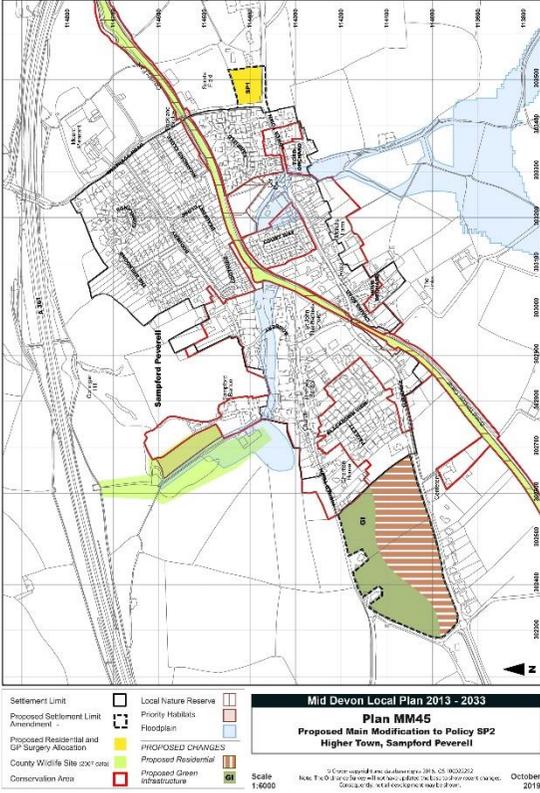
No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<b><u>submit management and maintenance details for the proposed green infrastructure.</u></b>	made by the Environment Agency to ensure green infrastructure is protected and managed beyond the initial construction/development.	the policy text are unchanged.
MM54	DM27: Protected Landscapes, and paragraph 4.94	190	<p>Amend Policy DM27 as follows:</p> <p>“Development proposals <del>within or</del> affecting the Blackdown Hills, Area of Outstanding Natural Beauty, Dartmoor National Park, Exmoor National Park and the North Devon Biosphere Reserve must demonstrate that:..”</p> <p>Amend paragraph 4.94 as follows: “Where major developments are proposed within <del>or adjoining</del> protected landscapes <del>or within the setting of or adjoining the protected landscapes or the</del> National Parks, ”</p>	<p>In response to the Inspector’s post hearings advice note:</p> <p>“The phrase ‘development proposals within or affecting’ at the beginning of Policy DM27 is a little confusing. A development proposal within a protected landscape will obviously affect it. If the intention is to offer some protection to views into or out of the protected landscape, which seems reasonable, then it may be clearer to make a specific reference to such views. This would mean a MM. Alternatively, reference could be made to the setting of a protected landscape but that is more difficult and require some form of definition in the explanatory text.”</p> <p>The Council has considered the Inspector’s post hearings advice note and proposes a modification accordingly.</p> <p>The retention of the word “affecting” in the opening sentence of amended Policy DM27 is consistent with Section 62 of the Environment Act 1995, section 11A (2 in respect of National Parks, and also Section 85 (1) of the Countryside and Rights of Way Act 2000 in respect of Areas of Outstanding Natural Beauty.</p>	<p><b>No change to SA findings:</b> The proposed modification does not affect the overall meaning of policy DM27 or its likely effects on the SA objectives. The significant positive (+3) effect already identified in relation to SA objective A (natural environment) is unchanged.</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
				<p>Section 62 of the Environment Act 1995 places a duty on the Council to have regard to the purposes of National Parks in exercising any functions in relation to or <u>affecting</u> land in a National Park. Similarly, Section 85 of Countryside and Rights of Way Act imposes a duty on the Council to have regard to the purpose of conserving and enhancing the natural beauty within an AONB in exercising any functions in relation to or <u>affecting</u> land in an AONB.</p> <p>Modification to paragraph 4.94 taken from Submission Document SD14. Included as a main modification in accordance with the Inspector's post hearing advice note. Modification proposed following representation made by Natural England (6242) to reflect the fact that the special character of protected landscapes includes the setting rather than only the adjoining land and follows National Planning Policy Guidance.</p>	
MM55	DM28: Other Protected Sites and paragraphs 4.102 and 4.95		<p>Amend Policy DM28 as follows: Delete the final paragraph: <b><del>"Where development proposals would lead to an individual or cumulative adverse impact on Natura 2000 sites, planning permission will be refused unless the proposal complies with criteria b) and c) above, and the</del></b></p>	<p>In response to the Inspector's post hearings advice note:  "I have a concern that Policy DM28, and in particular the way it approaches mitigation and compensation in criterion c), fails to comply with 'People over Wind' and subsequent judgements. I suggest at this stage that the Council checks this point with their expert</p>	<p><b>No change to SA findings:</b> The modification is proposed to ensure that the policy wording reflects recent case law with regards to HRA; however, it does not affect the overall meaning of the policy and the positive (+2) effect already identified in relation to SA objective A (natural environment) is unchanged.</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<p><del>fundamental integrity of the features of the Natura 2000 site would not be affected</del></p> <p>Replace the deleted final paragraph with:</p> <p><b><u>"Where development proposals are likely (leaving aside mitigation measures) to have a significant effect on a European site (as defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017), an appropriate assessment will be required. In such cases, planning permission will be refused unless it has been ascertained that with mitigation measures in place the development will not adversely affect the integrity of the site."</u></b></p> <p>Amend supporting paragraph 4.102 as follows:</p> <p>Delete the sentence:</p> <p><del>"... In the case of Natura 2000 sites, compensatory measures may only be considered if the proposal is deemed to be of overriding public interest and would involve engagement with both Central Government and European Commission."</del></p> <p>Replace the deleted sentence with:</p> <p><b><u>"... In the case of European sites, where the risk of harm to the integrity of a site has not been ruled out in an</u></b></p>	<p>advisors."</p> <p>MDDC has taken expert legal advice that has considered the wording of Policy DM28 and its supporting text at paragraph 4.102 require modification.</p> <p>Two modifications will be required to paragraph 4.95 to make this consistent with the modifications to Policy DM28 and paragraph 4.102.</p>	

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
			<p><b><u>appropriate assessment planning permission may be granted for the development only if there is no alternative solution and the development must be carried out for imperative reasons of overriding public interest. In such cases, any necessary compensatory measures must be secured.</u></b></p> <p>Amend the paragraph 4.95 through the deletion of the words "<del>Natura 2000 sites</del>" and "<del>Natura 2000 site</del>" and the replacement of these words with the words "<b><u>European Sites</u></b>" and "<b><u>European Site</u></b>".</p>		

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
Plan MM35	CU21: Land at Colebrook	Policies Map		<p>Contingency status removed in response to the Inspector’s post hearing advice note.</p> <p>The notation on the Policies Map has been modified to show site allocation CU21 as a proposed residential allocation. This modification is necessary to reflect the proposed Main Modification to the wording of site allocation Policy CU21.</p> <p>Please refer to proposed Main Modification MM35.</p>	<p><b>No change to SA findings:</b> This proposed amendment to the Policies Map reflects proposed modifications to the CU21 site allocation policy, which are considered separately above in terms of their implications for the SA findings (see MM35).</p>

No.	Policy/ Paragraph	Local Plan Page	Proposed Changes	Reason	Implications for SA findings reported previously
Plan MM45	SP2: Higher Town, Sampford Peverell	Policies Map		<p>Taken from Submission Document SD14. Included as a main modification in accordance with the Inspector's post hearing advice note. The area of Green Infrastructure has been further extended to limit the impact of the setting of the listed building.</p> <p>The notation on the Policies Map has been modified to show the increased area of Green Infrastructure to reflect the proposed Main Modification to criterion g) in the site allocation Policy SP2 Higher Town, Sampford Peverell</p> <p>Please refer to proposed Main Modification MM45.</p>	<p><b>No change to SA findings:</b> This proposed amendment to the Policies Map reflects proposed modifications to the SP2 site allocation policy, which are considered separately above in terms of their implications for the SA findings (see MM45).</p>

## Conclusions

- 1.30 As shown in **Table 2** above, the Proposed Main Modifications would result in a small number of changes to the SA effects previously identified for the Local Plan Review (in the February 2015 SA Report and in the 2018 SA Update). These changes are summarised in **Table 3** below.

**Table 3: Summary of changes to SA effects as a result of the Proposed Main Modifications**

Local Plan Review policy (as proposed to be modified)	Change to SA findings previously identified in the 2015 SA Report and 2018 SA Update
CU20 Cullompton Infrastructure	The proposed additional policy criterion will help to facilitate recycling, which will benefit SA objective D (safeguarding and minimising resource use). A minor positive (+1) effect was previously identified on this objective for policy CU20 as the site identified for the railway station is on brownfield land. <b>The addition of a new policy criterion relating to a replacement recycling facility would increase this to a positive (+2) effect.</b>
CU21 Land at Colebrook	The removal of the contingency status of this site does not change its likely effects on the SA objectives; however, <b>the effects previously identified would be more certain to occur. Effects may also occur earlier in the Plan period</b> now that the allocation of the site is no longer dependent on the relief road. A likely significant positive (+3) effect was identified in relation to SA objective G (meeting housing needs) but no likely significant negative effects were identified.
SP2 Higher Town Sampford Peverell	The deletion of the criterion relating to the need to deliver this site following the commencement of development of the M5 Junction 27 allocation does not change the likely effects of this site on the SA objectives; however, bringing forward the delivery of the site would mean that <b>the effects previously identified would occur earlier in the Plan period.</b> No likely significant effects, either positive or negative, were identified for this site allocation post-mitigation.  <b>The previously neutral (0) effect on SA objective H (health and wellbeing) is increased to a minor positive (+1) effect</b> as a result of the additional reference to active travel.
DM1 and new paragraph 4.5b	The proposed new criteria are brought into the policy from the now deleted policy DM12. The addition of these criteria to policy DM1 reinforces the already significant positive (+3) effects on SA objectives B (built environment) and C (climate change) as well as the positive (+2) effect on SA objective H (health and wellbeing) and <b>increases the positive (+2) effect on SA objective G (meeting housing needs) to significant positive (+3).</b>
DM12	The proposed deletion of this policy means that <b>the effects previously identified in the SA will no longer occur as a result of policy DM12.</b> Likely significant positive (+3) effects were previously identified (post-mitigation) in relation to SA objectives B (built environment) and G (meeting housing needs). However, the policy criterion are now proposed to be incorporated into policy DM1; therefore <b>the likely effects will still occur as a result of that</b>

Local Plan Review policy (as proposed to be modified)	Change to SA findings previously identified in the 2015 SA Report and 2018 SA Update
	policy.

### Cumulative effects

- 1.31 Although a small number of changes to SA effects would result from the Proposed Main Modifications, the changes to the SA findings (as summarised in **Table 3** above) do not fundamentally alter the cumulative effects of the Local Plan Review. Any effects that have changed have been made more positive as a result of the proposed modifications, and in most cases the changes are to the timescales over which likely effects already identified would occur. The overall scale of development proposed in the Local Plan Review, and the spatial strategy, are unaffected by the proposed modifications.

### Monitoring

- 1.32 The 2015 SA Report which accompanied the examined Local Plan Review sets out indicators for monitoring the effects identified through the SA of the Local Plan Review. Having reviewed and appraised all the Proposed Main Modifications to the Local Plan Review, it is considered that the same monitoring indicators remain appropriate and no changes to the SA monitoring framework are proposed.

### Next Steps

- 1.33 In LUC's professional judgement, the work carried out and presented in this SA Addendum is appropriate to meet the requirements of the SEA Regulations in relation to the Proposed Main Modifications.
- 1.34 This SA Addendum will be published alongside the Proposed Main Modifications to the Local Plan Review during a six week consultation period in early 2020.
- 1.35 Following the consultation, the Inspector will consider the representations raised in respect of the Proposed Main Modifications and will report on the modified Local Plan Review's soundness.
- 1.36 If the Local Plan Review is found to be 'sound', it can be formally adopted by Mid Devon District Council. Once the Local Plan Review has been adopted, a SA Adoption Statement will be published to report the full plan-making and SA process and the framework for monitoring future effects.

LUC  
October 2019

# Appendix 1

## SA Framework

**Table A1.1: SA framework for the Mid Devon Local Plan Review**

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

# Appendix 2

## Baseline and Evidence Base Updates

## Baseline information

- 1.1 Since the publication of the most recent version of the full SA Report (February 2015), the following additional evidence documents of relevance to the SA have been produced by or on behalf of Mid Devon District Council and are described below. They have been taken into account by the Council in both the preparation of the Proposed Submission (incorporating proposed modifications) version of the Local Plan Review and the SA work as appropriate.
- 1.2 All evidence relating to the Local Plan Review is available on the Council's website.
- Historic Environment Appraisal of Proposed Allocations (Mid Devon District Council, December 2016)
  - Mid Devon Employment Land Review Update (Lichfields, April 2018)
  - Cullompton Eastern Relief Road and Potential Strategic Motorway Improvement: Flood Risk Assessment (Arcadis, June 2018)

### *Historic Environment Appraisal of Proposed Allocations (Mid Devon District Council, December 2016)*

- 1.3 This appraisal was prepared in response to a representation made by Historic England during the Proposed Submission consultation for the Local Plan Review. The document provides an assessment of heritage assets affected by proposed development allocations, assesses the level of harm arising and any mitigation proposed. Levels of effects were scored based on a traffic light system. The document was used by the Council to inform the Proposed Submission (incorporating proposed modifications) version of the Local Plan Review, by weighing the benefits of proposals against any harm (if arising) as required by national planning policy.

### *Mid Devon Employment Land Review Update (Lichfields, April 2018)*

- 1.4 This document updated the Employment Land Review that had previously been prepared in 2013 by GL Hearn. Its purpose was to provide up to date evidence assessing the District's economic development needs. It concluded that the level of employment land need identified in the Local Plan Review was generally appropriate and consultation highlighted significant concern about the implications of providing for any lower level of employment land. A lack of available employment land and floorspace was deemed to be a significant concern and a potential risk to the future well-being of Mid Devon's economy.

### *Cullompton Eastern Relief Road and Potential Strategic Motorway Improvement: Flood Risk Assessment (Arcadis, June 2018)*

- 1.5 This Flood Risk Assessment (FRA) was undertaken in relation to the construction of a relief road and motorway junction system to the east of Cullompton town centre. It concluded that the scheme is at risk of fluvial flooding but that it is at low risk of flooding from surface water, groundwater and artificial sources and it is not at risk of flooding from coastal sources. A detailed hydrological assessment of the Culm and its tributaries was carried out. The FRA demonstrated that the majority of the scheme will be safe for its lifetime and that suitable measures can be put in place to mitigate the risks for the locations that are at risk from flooding. A number of recommendations were made for the scheme including that flood risk mitigation measures should be refined as part of the detailed design process and that a drainage strategy should be prepared and submitted in support of the planning application.

## Review of plans, policies and programmes

- 1.6 Since the publication of the Proposed Submission version of the Local Plan Review, the following national plans, policies and programmes have been updated/published that are relevant to the Mid Devon Local Plan Review:
- **National Planning Policy Framework (2019)<sup>12</sup>**: The NPPF sets out the government's planning policies for England and how these are expected to be applied. The original NPPF

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<sup>12</sup> National Planning Policy Framework, MHCLG, 2019: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>.

was published in March 2012<sup>13</sup>, before being updated in July 2018. The latest version of the NPPF was published in June 2019. Notable changes made since the publication of the original 2012 version include:

- Design policies are considered instrumental in delivering new homes, and local planning authorities (LPAs) must make sure that the quality of approved developments does not materially diminish between permission and completion.
- Planning policies and decisions should promote the diversification of town centres as this is key to their long-term vitality and viability. They should clarify the range of uses permitted in such locations.
- Planning policies and decisions should promote effective use of land, giving substantial weight to the value of using suitable brownfield land. There is also support for upward extensions and for local authorities to take a positive approach to applications for alternative uses on land which is currently developed but not allocated.
- Planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. There is also additional recognition of the role that planning can play in promoting social interaction and healthy lifestyles.
- Clarity on the ways in which transport should be considered as part of the planning process from the earliest stages of plan-making and development proposals.
- Plans are to have regard to the cumulative impacts of flood risk, rather than just to or from individual development sites.
- Updates also align with the 25 Year Environment Plan, including taking air quality into account in planning policies and decisions.
- **National Planning Practice Guidance (NPPG)<sup>14</sup>** : The NPPG was last updated in July 2019. It now contains further guidance on how Green Belt openness and enhancement can be assessed, guidance on maintaining housing supply and delivery, and the effective use of land.
- **A Green Future: Our 25 Year Plan to Improve the Environment<sup>15</sup>** : This document was published in January 2018 and last updated in May 2019. It sets out government actions to help the natural world regain and retain good health. It aims to deliver cleaner air and water in our cities and rural landscapes, protect threatened species and provide richer wildlife habitats.
- **The Road to Zero<sup>16</sup>** : This document was published in July 2018. It puts the UK at the forefront of the design and manufacturing of zero emission vehicles and aims for all new cars and vans to be effectively zero emission by 2040.
- **UK Plan for tackling roadside nitrogen dioxide concentrations<sup>17</sup>** : This document was published in July 2017 and last updated in October 2018. It is the UK air quality plan for bringing nitrogen dioxide (NO<sub>2</sub>) air pollution within statutory limits in the shortest possible time. It contains a number of actions to be undertaken across the UK.
- **Clean Air Strategy 2019<sup>18</sup>** : This document was published in January 2019, replacing the draft version published in 2018. It sets out what actions are required to tackle air pollution, such as Clean Air Zones. The will help ensure that targets set by government to tackle air pollution are met.

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<sup>13</sup> For information: the Mid Devon District Council Local Plan Review 2013-2033 is being examined under the 2012 NPPF.

<sup>14</sup> National Planning Practice Guidance, MHCLG, 2019: <https://www.gov.uk/government/collections/planning-practice-guidance>.

<sup>15</sup> A Green Future: Our 25 Year Plan to Improve the Environment, HM Government, 2019: <https://www.gov.uk/government/publications/25-year-environment-plan>.

<sup>16</sup> The Road to Zero, HM Government, 2018:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/739460/road-to-zero.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf).

<sup>17</sup> UK Plan for tackling roadside nitrogen dioxide concentrations, DEFRA, 2018: <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017>.

<sup>18</sup> Clean Air Strategy, DEFRA, 2019: <https://www.gov.uk/government/publications/clean-air-strategy-2019>.

- **Making the country resilient to a changing climate<sup>19</sup>** : This document was published by the National Adaptation Programme in July 2018 and replaces the previous version published in July 2013 that covered the period 2013 to 2018. This document covers the period 2018 to 2023. It sets out the actions the government is and will be taking to address the risks and opportunities posed by a changing climate.
- **Heritage Statement 2017<sup>20</sup>** : This document was published in 2017. It sets out how the government will support the heritage sector and help it to protect and care for our heritage and historic environment in coming years.

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<sup>19</sup> Making the country resilient to a changing climate, HM Government, 2018: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/727259/pb13942-nap-20130701.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727259/pb13942-nap-20130701.pdf).

<sup>20</sup> Heritage Statement 2017, DDCMS, 2017: <https://www.gov.uk/government/publications/the-heritage-statement-2017>.