



Local Plan
Review:
Proposed
Submission
Consultation

Sustainability
Appraisal

February 2015

Contents

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

1 Background

The Local Plan

- 1.1 Mid Devon's Local Plan sets the levels and distribution of development and strategic policies for the district. The document also sets out the infrastructure requirements needed to deliver the strategic objectives and states the policies by which development management decisions are made when determining planning applications. The existing Local Plan is made up of three parts:
- Core Strategy (adopted 2007)
 - Allocations and Infrastructure Development Plan Document (adopted 2010)
 - Local Plan Part 3: Development Management policies (adopted 2013)
- 1.2 Because the first part of the current plan was adopted seven years ago, it now needs to be brought up to date. The Council has therefore reviewed the targets, allocations, and policies contained within the current plan to reflect the latest evidence and guidance including the National Planning Policy Framework (2012). In reviewing the Local Plan, the Council has produced one document which will supersede the three parts of the existing plan. This new document entitled 'Local Plan Review: Options Consultation' (or Options Consultation), was out for consultation February – March 2014. The plan sets out the strategic options facing the district in terms of where new development could be located, and in what quantity. The Council has taken into account the representations received during the Options Consultation to compile the Local Plan Review Proposed Submission 2013-2033 (or Local Plan Review), which contains preferred policies and allocations. An outline of the contents of the Local Plan Review is set out below:

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	Superseded Policies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

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

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

Mid Devon will be a prosperous and sustainable rural district, where individuals, families and communities can flourish as a result of access to good quality local employment, housing and services and a clean, green, safe environment. Local communities and private, public and voluntary organisations will work in partnership to meet social and economic needs in ways that enhance the environment and reduce the area's carbon footprint. High quality development in the right places with appropriate infrastructure will bring regeneration, social and economic benefits and enhance towns, villages and countryside while promoting sustainable use of energy and other resources and tackling the causes and effects of climate change. The Council will use planning and related powers to:

Promote community well-being

- Diverse, inclusive communities with a vibrant mix of accessible uses and local services
- Sufficient 'fit for purpose', decent homes which people can afford
- Safe, healthy and crime free neighbourhoods
- Active, involved, well-educated citizens
- A good range of opportunities to travel by active and sustainable modes
- Strong town and village communities
- Green Infrastructure for personal leisure amenity space

Support sustainable economic success

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

Conserve and enhance the area

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

Respect environmental limits

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

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

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

Purpose of the Sustainability Appraisal / Strategic Environmental Assessment Report

- 1.5 In order to be in accordance with EU and UK legislation, any plan must be subject to a Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA). SA/SEA (or SA for short) assists in promoting sustainable development through integrating sustainability considerations into plan making. It is an iterative, ongoing process and integral to plan making. The process helps to consider the effects of the plan (and the effect without the plan) on the environment, on people and on the economy. It helps planning authorities to consider the merit of a variety of options to help determine the most sustainable policy decisions.
- 1.6 The SA highlights potential negative impacts of a plan, thereby providing the opportunities for these effects to be avoided or mitigated. However, the SA cannot ensure that development will be absolutely sustainable in all its aspects. It is possible that in some cases development which is in some respects less sustainable may still have to take place, perhaps where the social and/or economic benefits outweigh environmental impact.

Sustainability Appraisal Process

- 1.7 The Sustainability Appraisal Scoping Report (July 2013) (or SA Scoping Report) which accompanied the Local Plan Review: Scoping Report (or Scoping Report) was the first stage in the preparation of an SA for the new Local Plan Review. As set out in Government guidance on applying SA, the SA Scoping Report involved setting the context and objectives, establishing the baseline and deciding on the scope as follows:
- Identifying other relevant policies, plans and programmes, and sustainability objectives
 - Collecting baseline information
 - Identifying sustainability issues and problems
 - Developing the SA framework
 - Consulting on the scope of the SA
- 1.8 The interim Sustainability Appraisal (January 2014) (or interim SA) built on the initial findings set out in the Scoping Report SA. This was the next stage of preparing the SA which involved the developing and refining of options and assessing their effects. Government guidance on undertaking a SA defines this stage as including the following aspects:
- Testing the plan objectives against the SA
 - Developing plan options
 - Predicting the effects of the plan
 - Evaluating the effects of the plan
 - Considering ways of mitigating adverse effects and maximizing beneficial effects

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

Compliance with the Strategic Environmental Assessment Directive and Regulations

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

The SEA Directive requirements	Section within this SA that meets the requirement
Preparation of an environmental report in which likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated	The SA as a whole
a) An outline of the contents and main objectives of the plan and the relationship with other plans	Sections 1, 2 and Appendix 1
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Section 2
c) The environmental characteristics of areas likely to be significantly affected	Section 2
d) Any existing environmental problems which are relevant to the plan including in particular those relating to any areas of particular environmental importance	Section 2
e) The environmental protection objectives, established at	Section 2 and Appendix 1

international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account	
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	Appendix 2
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	Appendix 2
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Sections 3 and 4
i) A description of the measures envisaged concerning monitoring	Section 5
j) A non-technical summary of the information provided under the above headings	Non-technical summary

2 Sustainability context

Review of relevant plans and programmes

- 2.1 The Local Plan Review has not been developed in isolation – its content has been influenced by a large number of factors and policies defined by EU or UK legislation, national policies and other plans and strategies at a local level. Understanding the relationship between the Local Plan Review and other plans is important as it has influenced the options considered in preparation of the Plan. Information on these relationships has revealed where there are shared objectives or inconsistencies and constraints to be addressed.
- 2.2 Plans and strategies have been reviewed and grouped into theme areas. The SA has taken into account the latest guidance available and representations made following the publication of the Scoping and the Interim SA Reports. Many of the themes cut across each other, however to permit an analysis they have been collated under particular headings as set out below. **Please note only the conclusions from the review of relevant plans are contained below; the full review of plans and strategies can be found within Appendix 1.**

Carbon reduction and air quality

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

Biodiversity and green infrastructure

- 2.4 The biodiversity and green infrastructure plans and strategies reviewed have at heart the need to conserve and enhance biodiversity. Policies should avoid the deterioration of habitats, and look to preserve, restore and recreate priority habitats, with no net loss in priority habitats. Development should provide net gains in biodiversity where possible, balancing the economic and social needs of development with the objectives of bio- and geo-diversity conservation. Policies should also give consideration to biodiversity enhancing development. The Council should consider whether playing field provision can be provided by private as well as public means. Policies should not adversely affect the integrity of European sites either alone or in combination with other plans as set out in the Habitat Regulations published in 2007, updated in 2010 and again in 2012.

Climate change mitigation and energy

The UK is committed to achieving targets in reducing greenhouse gas emissions in order to tackle climate change, and development has a significant part to play to help achieve these

targets. Planning needs to minimise vulnerability to the impacts of climate change, and support the delivery of renewable and low carbon energy development.

Community and wellbeing

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

Economy and economic development

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

Historic environment

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

Housing

- 2.8 Nationally the country has not been building enough homes to house its population, and therefore significantly boosting the supply of homes is a priority. The proportion of the population of people above retirement age has increased and there is a need to provide appropriate housing in response. Providing for an ageing population or people with disabilities may need to be addressed through the delivery of homes that can be adapted as peoples circumstances change, or through the delivery of extra care housing. A wide variety of house types should be provided, across a range of tenures to meet the needs of the population. In response to the fact that the lower quartile house prices to lower quartile earnings ratio for 2013 was 8.37 (DCLG 2014) there is a need to provide affordable housing to address long social housing waiting lists and others with a housing need. Such issues are also acutely felt in some of the more rural locations of the district, where house prices may be even higher, and will need to be addressed through affordable housing delivery to meet an identified need. Provision for the needs of gypsies and travellers should be planned for which seeks to balance

their locational, economic and social needs with the protection of amenity and the environment. There is a need for modern homes to be environmentally sustainable, and meet the consumer demands of the population, including provision of sufficient storage space and private outdoor space.

Infrastructure

- 2.9 The reviewed plans and strategies highlight the importance of delivering infrastructure to meet the needs of existing and new communities. The Government places great importance on the delivery of the following infrastructure as part of ensuring sustainable economic development: transportation, flood protection, communications, research, energy and waste. Community facilities and schools are important infrastructural elements that are required to meet the needs of local communities as part of the delivery of sustainable development. It is recommended that all future allocations are assessed in terms of their impact on the Strategic Road Network and whether they comply with sustainable transport policy objectives and relevant guidance.

Land

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

Landscape

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

Minerals

- 2.12 There needs to be a sufficient supply of minerals to ensure the long-term ability to deliver infrastructure and development. The need for a supply of minerals needs to be balanced with the priority of protecting the environment. Planning for minerals extraction does not fall within the remit of Mid Devon District Council, being instead undertaken by Devon County Council. However, the consideration of the environmental impact of materials used in buildings and the desire to promote locally sourced materials is a district issue, as is the effect on local communities who are in close proximity to mineral workings. Minerals resources should also be protected from the sterilisation by development where these minerals are needed in the long term.

Rural areas

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

Transport

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

Waste

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

Water

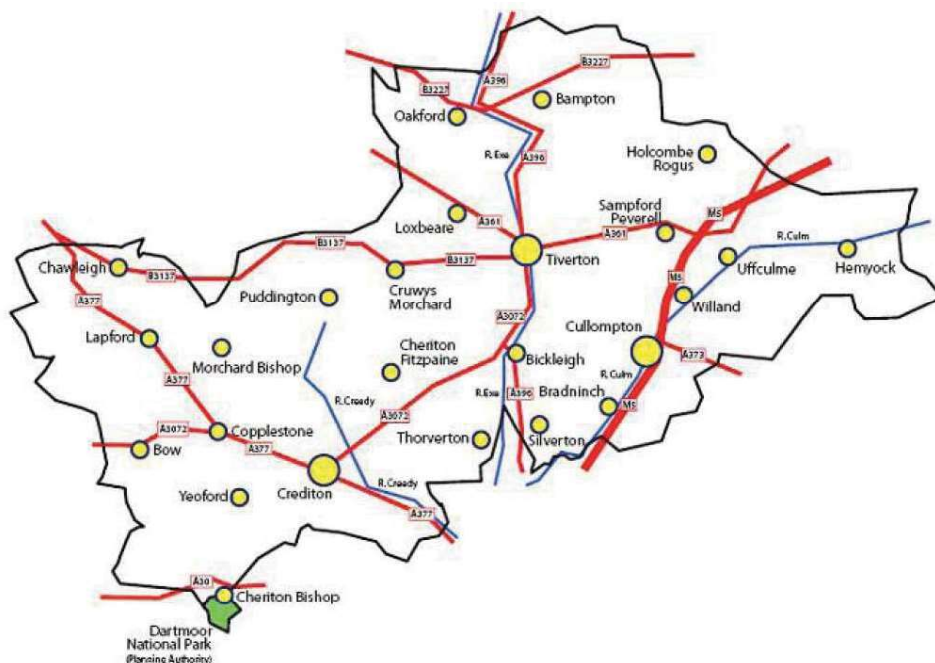
- 2.16 Managing flood risk and the effects of climate change is a key European, national and local priority, particularly as Mid Devon has suffered serious flooding in the past. In particular new housing and commercial development should incorporate measures to improve water efficiency and reduce surface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

Mid Devon's baseline characteristics and future changes

- 2.17 The collection of baseline data is a key component of the SA process to help establish a picture of the District. The information collected provides a basis for predicting and monitoring effects and helping to identify sustainability problems. The information collected is drawn from a mixture of sources from national plans and strategies and combined with local monitoring data.
- 2.18 Much of the information represents generic data about the district, rather than specifically generated information in relation to the development of the Local Plan Review. Some of it will have been relevant in the production of previous local development documents, whilst other data will have been updated more recently. Some information may not be up to date, but may be the most recent available. The information provided covers a broad range of environmental, social and economic matters which collectively understood help to assess sustainability.

Location

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



Physical characteristics (including landscape)

- 2.19 The district of Mid Devon covers an area of 353 square miles (914 sq. km) in the heartland of Devon. It lies between Dartmoor, Exmoor and the Blackdown Hills. From the centre of the district, the north and south coasts of Devon are each about 30 miles away. The landscape's strong rural characteristics complements a historic sense of place, with medieval field patterns interspersed within the productive agricultural landscape, broken by tracts of internationally important Culm grasslands and scattered traditional settlements typically associated with Devon. The majority of Mid Devon's settlements are nestled within the folds of the landscape, with many small historic settlements containing thatched cottages and ancient churches.
- 2.20 The Mid Devon district forms the heart of the Devon countryside, linked to the south coast by the River Exe with its valley and surroundings. Most of the district's rivers drain southwards in steep-sided valleys into large expansive floodplains. The market towns of the district have typically evolved as riverside settlements. The intricate course of the River Exe is the most

defining landscape feature in Mid Devon, providing a continuous thread flowing from the northern extremities of the district down to the south near Thorverton. To the east the Blackdown Hills have a unique geology and provide an often isolated and valued distinctive rural landscape.

- 2.21 The Culm Valley to the east is a low lying flat prosperous agricultural area, with good soil fertility. The north and northwest of the district is a high flattish landscape with a rather unsheltered windswept appearance, formed by the Culm Measures, so called for its underlying thin bed of coal known locally as 'Culm'. The farming hinterland to the north of Crediton, often referred to as the Mid Devon farming belt, has all the typical elements that make up the distinctive Devon landscape, with its varied patchwork of irregular shaped fields with green pastures.
- 2.22 Natural England has divided England into Natural Character Areas, with Mid Devon falling into three distinct areas: the Culm, the Devon Redlands and the Blackdowns. The Mid Devon Landscape Character Assessment provides further more localised characterisation. The Devon Redlands has a very strong, unified character. The underlying red sandstone and consequent red soil dominate the landscape through ploughed fields, cliffs and exposures, and are visually evident in the traditional stone and cob farmsteads, hamlets and villages that are scattered across the area. Not only does the soil visually characterise the area but its fertility also makes it the agricultural heart of Devon.

Biodiversity and green infrastructure

- 2.23 The varied nature of Devon's geology and landform has led to a considerable range of biodiversity. There are various protected species found in Mid Devon, such as woodlark, bats and dormice. In comparison with the rest of Devon, Mid Devon has relatively little land designated as being of national importance and no designed or candidate European sites. Within Mid Devon there are 12 Sites of Special Scientific Interest (SSSI), three local nature reserves and two nature reserves managed by Devon Wildlife Trust. Mid Devon has over 8 sq. km. of ancient woodland. The district supports a range of important wildlife including over 200 County Wildlife Sites and Regionally Important Geological Sites.
- 2.24 To the east of the district lies the Blackdown Hills AONB, this is highly valued not only for its visual qualities but also for its geology, biodiversity and human heritage. The Blackdown Hills support species and habitats such as purple moor grass and rush pastures that are in rapid decline in the UK. The North Devon Biosphere Reserve transition area also covers part of Mid Devon.
- 2.25 Changes in wildlife populations and habitat have occurred throughout the last century and show a general trend of decline. Many of Devon's habitats are small and fragmented and their health is threatened due to a range of issues. The main threats to biodiversity include environmental pollution, land use change, fragmentation and invasive species introduction. These pressures are likely to continue and biodiversity may also be affected by climate change and recreational pressure. Hedgerow removal and unsympathetic conservation of rural buildings can impact on important species identified in the Devon Biodiversity Action Plan.
- 2.26 In particular the RSPB's State of Nature Report (June 2013) stated that 60% of species on which they hold data are in decline, whilst 31% have declined strongly. Half of the species assessed

have also shown strong changes in abundance or distributing, indicating that recent environmental changes are having a dramatic impact on the nature of the UK's land and seas. In particular species with specific habitat requirements are faring worse than generalist species that are better able to adapt to a changing environment. Action needs to be taken to save nature for its intrinsic value and for the benefits it brings to us that are essential for well-being and prosperity.

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

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

2.28 The Culm Grasslands site is considered to be at greatest risk from development, due to its location on the A361 and proximity to the Mid Devon boundary. The A361 is the main route into North Devon from the M5 motorway, providing a vital tourism link as well as a certain amount of commuter and shopping traffic in either direction. Natural England has advised that any development that encourages through-traffic may impact on the SAC through air pollution. This has been considered by the HRA for the Local Plan Review which concludes that the development proposed in the Local Plan Review alone will not result in adverse effects on the integrity of European Sites around Mid Devon. However uncertainties exist regarding the potential for the North Devon and Torridge Local Plan to have significant effects on the integrity of the Culm Grasslands SAC as a result of increased air pollution. Therefore it is not yet possible to conclude that there will be no likely significant effects as a result of implementing the new Mid Devon Local Plan Review in-combination with the North Devon and Torridge Local Plan.

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

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

Climate change mitigation and energy

- 2.31 Forecasting the future impact of climate change is particularly challenging, though there is extensive scientific evidence that the world's climate is changing. The UK Government has stated that if the global average temperature rises more than 2°C above pre-industrial levels, significant negative impacts of climate change will be more likely and the cost of managing them will rise sharply. To have a 50% chance of keeping climate change to within 2°C of pre-industrial levels, global greenhouse gas emissions need to peak before 2020 and then decline steeply. Evidence suggests at present emissions are continuing to soar. On 10 May 2013, concentrations of CO₂ in the atmosphere passed 400 parts per million, the highest level in 50 years of data collection, and a peak not estimated to have been experienced for three-five million years (the Pliocene period, a time when the arctic was ice-free and sea levels were 40 metres higher than today).
- 2.32 There are many risks associated with increasing climate change. These include threats to agriculture as a result of higher demand for water resources, reduction in productivity in farming or forestry land as a result of drought or conversely as a result of flooding. Businesses are likely to be affected by increased risk of flooding, competition for water, energy and materials and the disruption of transport networks and communication links. The flooding and resultant disruption to the Great Western Railway line near Stoke Canon in December 2012 highlights the potential impact on the region. The natural environment could be affected resulting in increased concentrations of pollutants in low water levels or reduced river flows damaging freshwater habitats and other ecosystem services; warmer rivers, lakes and seas impacting on biodiversity; flooding impacting on key habitats; ocean acidification affecting species and habitats and changes in seasonal events.
- 2.33 These effects will be experienced at a time when national energy reserves are declining. Much existing energy infrastructure is in the process of closing as it reaches the end of its operational life, whilst domestic fossil reserves of oil and gas are declining. The amount of spare electricity capacity in the system could fall from around 6% (2013) to around 4% in 2015/16, before recovering to around 8% by 2018/19 (Statutory Security of Supply Report, 2013). To ensure there is sufficient energy to meet the UK's energy needs, and to mitigate the impacts of climate

change there is a need to increase our reliance on low carbon technology. The region is rich in renewable energy resources and Devon has the highest installed renewable energy capacity of any county in the South West.

- 2.34 Whilst Government pays subsidies in the form of tariffs for renewable energy and maintains a positive approach to moving to low carbon energy sources, pressure for such developments within Mid Devon is likely to increase – particularly given the district’s location (i.e. annually more sun in the south, and more wind as the area is exposed to the prevailing south westerly winds). However, this has implications for conflicts that may arise as a result of landscape impacts, particularly given the proximity to National Parks and the Blackdown Hills AONB. Historically, large-scale renewable energy developments have often been vocally opposed by local communities.

Mitigating the effects of climate change will also require the use of lower carbon resources in the construction industry, particularly as part of the development of houses and other buildings. Buildings will need to use fewer resources through the use of materials with a lower lifecycle carbon use, whilst simultaneously increasing energy and resource efficiency. Building regulations have been gradually amended to improve the energy efficiency of homes which will have affected the carbon output of recent new builds nationally. As the Local Plan Review has progressed, Central Government have consulted on a ‘Housing Standards Review’ (2013) which set out the range of standards to be considered. Since this consultation, Government have produced a nationally described Space Standard which has been incorporated into Mid Devon’s Local Plan Review, under Policy DM13: Dwelling sizes.

Population and housing

- 2.35 The release of data from the 2011 Census has shed new light on population trends in Mid Devon. In combination with other data sources, this helps to build a picture of changing household composition and long-term needs. The population according to the census is 77,750, an increase of approximately 11% upon the 2001 figure, a rate of growth that has risen faster than the rest of Devon, the South West and England.
- 2.36 The average household size in Mid Devon is marginally smaller at 2.35 persons than the England average of 2.36 persons. The median age of the population in Mid Devon rose from 41 in 2001 to 44 in 2011. In comparison the median age in England and Wales climbed from 37 to 39 over the same period. Whilst overcrowding has risen slightly to 4.4% from 4% between 2001 and 2011 it remains well below the figure for England and Wales of 8.5%. The 2011 Census also showed that 20.3% of households include a member with a disability.
- 2.37 The Council has commissioned a new Strategic Housing Market Assessment (SHMA) in partnership with some of our neighbouring district councils. This will provide definitive, up-to-date information on the level of housing need and demand across the Exeter Housing Market Area. Local planning authorities are required to cooperate with each other on strategic planning matters.

Community and wellbeing

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

However, life expectancy is 4.9 years lower for men in the most deprived areas of Mid Devon than in the least deprived areas. Over the last 10 years all-cause mortality rates have fallen. About 16.9% of Year 6 children are classified as obese, whilst levels of teenage pregnancy and smoking in pregnancy are lower than the England average. Priorities for Mid Devon include addressing healthy weight in childhood, cardiovascular skin disease, skin cancer prevention, alcohol use and smoking. The Council's Green Infrastructure Plan also recognises that access to public rights of way, playing fields and recreational open space is an essential aspect of public health and wellbeing.

- 2.39 Despite the impact of the recession, incidents of recorded crime have continued to fall year on year since 2007/08. Furthermore, the area is one of the lowest for recorded crime within Devon and Cornwall.

Economy and employment

- 2.40 The majority of Mid Devon's employment falls within the service sector, which includes occupations where knowledge and time are offered to improve productivity. Examples include transport and distribution, retail and services such as accountants or building surveyors. This sector accounts for 74.8% of Mid Devon employment (Economic Trends Report, August 2014).
- 2.41 Overall the net commuter flows of Mid Devon District show that more people commute out of Mid Devon than those that in commute with a strong 'pull' from neighbouring urban areas, especially Exeter. The district profile produced for the Local Economic Assessment (2012) found that there is a high level of self-employment within Mid Devon, and the district is above the Devon average for business density (number of businesses per working age person) and business start-ups. While school-level attainment is above average for the county, this does not translate to a highly skilled resident workforce, implying that high-attaining school leavers are not staying in Mid Devon.
- 2.42 The Council commissioned an Employment Land Review in 2013, to assess the scale and nature of demand for employment land and premises in the District. The report concludes that the evidence suggests that the Council should consider rationalising its employment land supply through review of planning policies. It recommends that the Council plan for 30-40 hectares of employment land over a twenty year period, equating to approximately 140,000 square metres floorspace.
- 2.43 The Council commissioned a Retail Study in 2012, to assess both demand and the capacity of the local catchment areas to support different sorts of retail growth. The report highlighted that Mid Devon's market towns are in a vulnerable position, similar to other small-medium sized towns across the country. The study identifies common trends, such as national retailers consolidating their businesses in larger regional centres, while internet shopping also takes trade away from town centre shops. Retail forecasts predict weak growth in spending, resulting in possible reductions in town centre retail space, with these effects potentially being most acutely felt in Crediton and Cullompton. Out-of-centre retail development may be most attractive to developers due to lower land values but may harm the existing town centres. Regeneration of the town centres, particularly as Tiverton is in receipt of government regeneration funding as part of the 'Portas Pilot' programme, is a priority, but one that faces significant challenges. Tourism also represents a small but important sector within the district.

Devon is a popular destination for domestic tourism, though traditionally Mid Devon has not been a significant recipient of tourism spend as visitors bypass the district en route to other parts of the county, particularly those areas closer to the coast. Previously, tourism development focused on the small scale provision of visitor accommodation, often on farms that were diversifying their activities. A Mid Devon Peer Challenge undertaken in early 2013 highlighted tourism as an economic area on which the district could capitalise. Further detail on the type of tourism offer that should be pursued is presented in the Tourism Study (2014). The Tourism Study identifies a number of areas where opportunities exist to encourage tourism in the District and proposes a multi-pronged approach focussing on: marketing market towns and surrounding areas; developing the accommodation offer; maximising the natural offer; catching passing tourists and creating fun activities for children to attract family trips.

Historic environment

- 2.44 Mid Devon is a district with a rich historic and cultural heritage. There is a wealth of historic buildings and features throughout the district, with over 2680 listings of buildings, bridges and milestones. The district has three historic parks and gardens of national importance – Knightshayes, Bridwell Park and Shobrooke Park, with an additional 16 of local value. The area also has 51 conservation areas and 49 scheduled ancient monuments, including castles, roman forts, stone crosses, bowl barrows, a henge, abbey, ring ditch, iron age earthworks, camps, a Romano-British villa, Neolithic causewayed enclosure and a hillfort. In addition there are a wide range of archaeological remains which are not scheduled.
- 2.45 The three main towns of the district all have a particular historic importance. Tiverton has its origins in a ford across the Rivers Exe and Lowman and has an attractive historic centre and a rich legacy of buildings of all periods. Crediton is a historic market town with medieval burghage plots that can still be discerned in the south side of the High Street. Cullompton is an old town with two Grade I Listed properties and some ninety Grade II. However, whilst the heritage of the district is critical to local character, there is no comprehensive coverage of documents that provide an aide to protection. Of the 51 conservation areas, only 13 have conservation area appraisals (CAAs) and five have conservation management plans. Whilst the three main towns and a number of the larger villages are all covered, other villages and smaller settlements within the district have no coverage. Production of additional appraisals has slowed in recent years, with only two conservation areas adopted in 2003 and one new conservation area and associated appraisal and management plan adopted in 2014, as well as a total of five revisions to boundaries in the last 10 years. Cullompton has an Article 4 direction in place, which offers a degree of protection over and above that of the conservation area designation. Plans to put in place a similar directive in Bradninch were discussed but have not been adopted. The Heritage at Risk Register (2014) identifies 24 Heritage assets at risk within Mid Devon District. These range from conservation areas to Listed Buildings and Scheduled Ancient Monuments.
- 2.46 There are also potential conflicts between the protection of heritage assets and mitigating the impact of climate change. In particular this is played out where home owners wish to install renewable energy features, such as solar PV arrays on roofs in a conservation area or on a listed building. Such developments may not positively contribute to local character or may reduce the significance of the heritage value of a building. This represents a potential conflict of sustainability objectives.