

Appendix 6.3 p19-40

Resources

- 2.47 Energy is a crucial consideration in the functioning of the economy, and one area of concern is the future of non-renewable sources of energy, particularly oil. There has been much discussion about the notion of 'peak oil' in recent decades, the theory being that production of oil will peak in coming decades, with demand outstripping supply. Whilst there is academic disagreement on the reality of the peak oil theory, there is growing consensus that the age of cheap oil is coming to an end. Declining production of existing older oil fields will exacerbate production problems. As a result, more than two thirds of current crude oil production capacity may need to be replaced by 2030, simply to prevent production from falling. This is likely to be extremely challenging, and will likely result in necessary demand reduction and sourcing alternative sources of energy supply. Local effects of peak oil will include increased costs for fuel, with significant rises already having taken place, affecting motor vehicle users, but also passengers on public transport facing higher fare costs. As the government seeks to deliver a balanced future energy supply, there is likely to be greater desire to deliver renewable energy developments, with pressure particularly felt in rural areas for onshore wind and solar farms.
- 2.48 There is also uncertainty over the future supply of phosphorus, which is an essential ingredient in fertilisers, and plays a critical role in contributing to modern agricultural production. Some researchers have predicted that phosphorus reserves are expected to be completely depleted within 50-100 years, though this is not universally agreed. Such reductions will have a significant impact on farming productivity, land use and food supply.
- 2.49 Water is essential for human life and to sustain a diverse and thriving water environment. It is important to our economy as an essential requirement for industry, power generation, commerce and agriculture. Over the next 30 years, there will be increasing pressures from rising populations and associated development. Looking further ahead, the impact of climate change could have a major impact on water that will be available for all uses.
- 2.50 Building on previously developed land, "brownfield land", avoids the need to use greenfield land for new housing. In recent years, Mid Devon has developed a high proportion of new housing and employment on brownfield sites, with totals of 34% of new or converted housing and 69% of new employment development in 2012/13. This trend is not likely to continue as previously developed land is a finite resource, which is relatively scarce in a rural setting such as Mid Devon. Government policy encourages the effective use of brownfield land, provided that it is not of high environmental value; however this approach is less strict than previous national policy. Conversely, national policy now provides less support for the long-term protection of employment land for development for alternative uses. This could mean existing brownfield land being used for housing, potentially reducing the overall amount of greenfield that needs to be allocated.
- 2.51 Government guidance also states that planning should consider the economic and other benefits of the best and most versatile agricultural land. A national grading system has been in place since the 1960s which classifies the quality of agricultural land based on factors based on soil, climate and site. At the time of original mapping the breakdown of grades within Mid Devon was as follows:

Grade	Percentage land coverage
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1	3.48%
2	11.01%
3	64.44%
4	19.86%
5	0.05%
Non-agricultural	0.28%
Urban	0.89%

Source: MAFF (1966)

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

Minerals

2.52 Devon is also a county with valuable mineral resources. The county for example, along with Dorset and Cornwall, is the only source in the UK of ball and china clay. Responsibility for minerals planning is a function of Devon County Council. Mid Devon is the setting for a number of locations of mineral extraction. Strategic mineral sites producing minerals of national importance or making a significant contribution to delivering sub-regional aggregates include the winning of limestone at Westleigh.

Rural areas

2.53 National government statistics classify Mid Devon as a 'Rural-80' based on the location of the local population. This statistic refers to the fact that over 80% of the population are resident in rural settlements (including those with urban areas with between 10,000 and 30,000 population regarded as 'larger market towns'). Classifying Mid Devon as a 'Rural-80' local authority puts it in a category of the most rural local authorities within the UK.

2.54 Rural businesses are a key element of the local economy. There is a growing trend for individuals to set up their own businesses, particularly in rural areas where areas such as Mid Devon can provide a high quality of life and where transport costs and distances can encourage home-working. Broadband access and speeds can be a key issue for rural-based businesses. A programme to connect Devon and Somerset with superfast broadband is underway which will result in speeds of at least 24Mbps to at least of 85% of homes and businesses by 2015. However, many rural areas currently receive less than 2Mbps at present, which may hinder the start up or expansion of rural businesses.

2.55 Access to services is also an issue for rural areas. Statistics for the whole of Devon show a decrease in the number of households within good transport access to key services or work. Levels of public transport providing services to villages in Mid Devon have shown a decrease

since 2006. In particular the number of daily services to these settlements has shown a steady decline across this period.

Transport and air quality

- 2.56 As a rural area, Mid Devon has a high dependency on the car, particularly as public transport provision and coverage is far from extensive, and has shown signs of contracting. These factors are reflected in the level of car ownership, which has increased at both national and local levels. The average household in Mid Devon now owns 1.47 cars, as opposed to 1.33 at the time of the previous census. The percentage of households owning 2, 3 and 4 or more cars has all increased, whilst the share of those who do not own a car has fallen. In particular, the ratio of cars owned per household in Mid Devon has continued to grow at a consistent rate whilst growth in the national level has shown signs of levelling off. This has led to inappropriate or anti-social parking, rather than a reduction in car ownership. Future developments should make suitable provision for parking in order to reflect the rural nature of the district and levels of ownership. Neither does it appear that higher fuel costs have had an effect on car ownership, though high levels of ownership do not always translate into high levels of usage.
- 1.3 High levels of car ownership and hotspots of poor local road infrastructure have impacted on local air quality. Both Cullompton and Crediton were designated as Air Quality Management Areas in 2006 and 2004 respectively. Principal actions to address the excessive levels of Nitrogen Dioxide and particulates in the air include the development of the Crediton Link Road and two relief roads within Cullompton. Work to provide the Crediton Link Road was completed in 2014, however to date there has been no progress on new roads in Cullompton.
- 1.4 The M5 motorway through Mid Devon generally functions well but there are junction capacity issues at Junction 27 (J27) and Junction 28 (J28). Improvements are planned to both junctions but further works will be required to accommodate the level of growth proposed in the Local Plan Review. Mid Devon District Council will work closely with the Highways Agency (or any successor) to help ensure the continuing functionality of the M5. The Great Western mainline railway runs north-south through the district and has an hourly high speed train service between Bristol and Exeter, to and from London and an hourly cross country service to and from the midlands and the north.
- 1.5 Furthermore, the Tarka line, between Exeter and Barnstaple, provides hourly local services. There is an opportunity to open a station at Cullompton to serve Taunton and Exeter commuters. Key airports serving the area are Exeter and Bristol, offering scheduled flights to a number of domestic and European destinations as well as charter traffic.

Waste

- 2.57 National policy on waste prioritises reduction, re-use or recycling in order to prevent waste going to landfill. Local authorities will experience increasing costs as a result of waste going to landfill, which will need to be reduced by using alternative methods of waste management, particularly given the severe pressures that are on Council finances as a result of Central Government funding cuts. There are also implications for climate change as a result of how waste is managed. In many cases carbon acts as a good proxy for the overall environmental impacts of waste: generally speaking, the higher up the waste hierarchy waste is treated, the

smaller the greenhouse gas impacts. Devon County Council has the duty as the waste planning authority and they are in the process of adopting the Devon Waste Plan 2014.

Water

1.6 Mid Devon has suffered serious flooding in the past, and the risk of flooding is likely to increase in the future as a result of climate change. The State of the Environment Report (2014) produced by the Devon Local Nature Partnership noted that the economic damage from flooding in Devon, Plymouth and Torbay currently costs £81m per year. This is estimated to rise to £1b per year in 2100 if no further protection measures are implemented.

2.58 Forward planning must take account of this risk to ensure that new development is sustainable. Winter rainfall is predicted to increase by 15-30% by the 2080s as a result of climate change, with a concomitant 20% rise in peak river flow. Impermeable surfaces of buildings, roads and pavements limit infiltration and increase the volume and rate of surface water runoff. Future development may increase the area of impermeable surfaces unless a sustainable approach to water management is adopted that promotes sustainable urban drainage (SuDs) and improved water efficiency within buildings. Government are currently consulting on changes to national policy on delivering SuDs. Subject to the outcome of this consultation, any changes to planning policy would come into force spring 2015. Proposals include applying a requirement that SuDs are provided to schemes of 10 or more homes, giving scope to decision-makers to give increased weight to the provision and maintenance of SuDs and rejecting applications that fail a policy requirement to normally deliver SuDs first over conventional drainage. A Strategic Flood Risk Assessment was commissioned in 2014 and considered the Local Plan Review and potential allocation sites. The conclusions from this assessment have been used in determining the strategic and site-specific options in the Local Plan Review to help steer new development to areas with the lowest probability of flooding.

Sustainability issues

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

Key sustainability issues	
Natural Environment	Biodiversity levels are continuing to fall, often dramatically for some species. There is potential for negative impact on the Water Framework Directive status of waterbodies across the district as a result of development.
Built Environment	Some heritage assets are at risk. Some climate change objectives can conflict with the conservation of the area’s historic environment, particularly in the installation of renewables technologies that may impact on heritage assets.
Climate Change and Flooding	There is pressure for the installation of renewable energy developments to meet energy shortage however this may conflict with other objectives e.g. built environment. There is an

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

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

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

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

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

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

3 Sustainability Appraisal Methodology

Developing the plan and options

3.1 This is the third consultation that has taken place as part of the preparation of the Local Plan Review. The initial consultation, undertaken during July and August 2013, set out the scope of the review and the issues facing the district, and sought feedback on the broad direction of development for the district over the next 20 years. That consultation included no policies or sites. The second consultation undertaken during February and March 2014 (Options Consultation) set out the options available to the district, including a range of strategic options in terms of where growth is focused over the next twenty years. A range of sites across the district where this growth could be located were also been included. A scoping and interim SA accompanied the two previous consultations on the Local Plan Review which provided an assessment of the sustainability impacts of the scope of the plan and policy options.

Local Plan Review: Scoping Report

3.2 Natural England and the Environment Agency made a number of recommendations about the content of the Scoping Report. These have been incorporated into the SA. In summary, their responses stated the following:

- The document should include and take account of National Character Areas, which are currently being revised by Natural England (links to the relevant profiles were provided)
- Environmental issues should be addressed at a strategic level, with a holistic approach being applied to all biodiversity and green infrastructure needs
- The plan should recognise the importance of land management and its implications for the ecological quality and status of a river
- Access to open green space should be referenced in relation to community and well-being
- Reference to water as a resource should be included
- A Strategic Flood Risk Assessment should be undertaken in parallel with the revised Local Plan Review. Information regarding the Water Framework Directive status of waterbodies in Mid Devon should be included, with reference to the South West River Basin Management Plan
- The framework of indicators should be updated to consideration of impacts on the following indicators: 'resilience to climate change' and 'water resources'
- The Mid Devon Green Infrastructure Assessment, the South West River Basin Management Plan and the Water Framework Directive should be added to the list of relevant plans and programmes

Local Plan Review: Options Consultation

3.3 The Local Plan Review: Options Consultation report contained a range of strategic policy options and sites. It contained more sites than the Council needed to allocate. Some of the sites were listed as preferred sites. These were stated as preferred as they are already allocated in the current Local Plan, and therefore have been subject to public consultation and Examination in Public as part of the process for adopting the Allocations and Infrastructure

Development Plan Document (AIDPD) in 2010. The sustainability of these sites was also previously subject to a SA alongside the preparation of the AIDPD document. Though stated as preferred in this second consultation, they were still subject to ongoing SA and consultation as part of the process of preparing the Local Plan Review.

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

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

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

Sustainability Appraisal framework objectives

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

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

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

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

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

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

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

3.11 The use of a scoring system with a range from +3 to -3 highlights the scale of any potential impact. This system enables the opportunity to differentiate between marginal or significant impacts. The following table sets out the scoring system that has been used:

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

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

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

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

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

4 Reasons for selecting / rejecting policy alternatives

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

Strategic Policies

Policy S1 Sustainable Development Priorities

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

Alternatives

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

Policy S2 Amount and Distribution of development

Amount of residential development

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

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

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

Alternatives

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

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

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

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

Amount of commercial development

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

Alternatives

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

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

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

Distribution of development

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

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

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

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

Alternatives

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

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

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

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

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

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

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

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

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

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

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

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

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

Alternatives

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

Policy S5: Public open space

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

Alternatives

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

Policy S6: Employment

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

Alternatives

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

Policy S7: Town Centres

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

Alternatives

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

Policy S8: Infrastructure

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

Alternatives

4.40 No reasonable alternative strategy has been identified.

Policy S9: Environment

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

Alternatives

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

Policy S10: Tiverton

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

Alternatives

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

Policy S11: Cullompton

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

Alternatives

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

Policy S12: Crediton

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

Alternatives

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

Policy S13: Villages

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

Alternatives

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

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

Bampton

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

Alternatives

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

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

Policy S14: Countryside

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

Alternatives

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