



Local Plan  
Review:  
Proposed  
Submission  
Consultation  
(incorporating proposed  
modifications)

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Sustainability  
Appraisal Update

January 2017

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## **Sustainability Appraisal Update**

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

### **Sustainability Appraisal framework objectives**

2. 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.

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

I) Delivering the necessary infrastructure	Roads and transportation; schools; health services; community facilities; green infrastructure; telecommunications	
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3. 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.
4. 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.
5. 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.
6. 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

7. 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..
8. 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.
9. General guidance was followed when applying the scoring system to potential allocation sites. A copy of the site allocations appraisal guidance provided on p.192 of the Local Plan Review: Proposed Submission Consultation Sustainability Appraisal (2015) is provided below.

## SA framework – appraisal guidance [Allocations]

The following table sets out the general guidance followed when applying the pre-mitigation scoring system to potential allocation sites. In some cases the scoring may differ from this guidance due to site specific context. A cumulative approach was taken when assessing allocation sites within each objective.

Sustainability objective	Elements covered	Pre-Mitigation	Post-Mitigation
A) Protection of the natural environment	Habitats and biodiversity; flora and fauna; protected species; landscape; geodiversity	<p>Neutral impact</p> <ul style="list-style-type: none"> <li>• If the site is within a town or existing development forms a backdrop of the site</li> <li>• If the site is appropriately screened, for example by being hidden in a fold of a hill</li> </ul> <p>Slight negative impact</p> <ul style="list-style-type: none"> <li>• Small site on the landscape (less 100 dwellings/10,000sqm)</li> <li>• Impact on a Tree Preservation Order</li> <li>• Impact on a protected landscape</li> <li>• Impact on local wildlife</li> <li>• Loss of hedgerows that provide screening</li> <li>• Existing development forms a backdrop but the site is highly visible</li> </ul> <p>Negative impact</p> <ul style="list-style-type: none"> <li>• Large site on the landscape (100 dwellings/10,000sqm +)</li> <li>• Site is highly visible and there is no existing development forming a backdrop</li> </ul>	
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	<p>Positive impact</p> <ul style="list-style-type: none"> <li>• Large scale town centre improvements</li> </ul> <p>Slight positive impact</p> <ul style="list-style-type: none"> <li>• Small scale town centre improvements</li> <li>• Good relationship with the settlement</li> </ul> <p>Slight negative impact</p> <ul style="list-style-type: none"> <li>• Impact on Listed Buildings / Conservation Area</li> <li>• Impact on Archaeological potential</li> <li>• Poor relationship with the settlement</li> </ul>	

Sustainability objective	Elements covered	Pre-Mitigation	Post-Mitigation
C) Mitigating the effects of climate change	Reduced flood risk; promotion of low carbon or renewable energy; reductions in carbon emissions; walking and cycling provision; low carbon buildings	<p>Slight positive impact</p> <ul style="list-style-type: none"> <li>• Bus service</li> <li>• Train service</li> </ul> <p>Neutral impact</p> <ul style="list-style-type: none"> <li>• Flood zone 1</li> <li>• No train services (as limited areas have a train service and therefore it would not necessarily be expected of all areas in Mid Devon)</li> </ul> <p>Slight negative impact</p> <ul style="list-style-type: none"> <li>• Small scale development, potential impact on groundwater (less 100 dwellings/10,000sqm)</li> <li>• No delivery of Sustainable Urban Drainage</li> <li>• Small watercourse</li> <li>• Source Protection Zone</li> <li>• No bus service</li> <li>• Large scale sites due to potential carbon impact</li> </ul> <p>Negative impact</p> <ul style="list-style-type: none"> <li>• Large scale development, potential impact on groundwater (100 dwellings/10,000sqm +)</li> <li>• Flood Zone 2/3</li> </ul>	
D) Safeguarding and minimising resource use	Quality of soils, including contaminated land; water quality, including consideration of water framework directive objectives; minimisation of waste; impact on best and most versatile agricultural land	<p>Positive impact</p> <ul style="list-style-type: none"> <li>• Brownfield land</li> </ul> <p>Neutral impact</p> <ul style="list-style-type: none"> <li>• Small scale grade 4-5 agricultural land</li> </ul> <p>Slight negative impact</p> <ul style="list-style-type: none"> <li>• Large scale grade 4-5 agricultural land</li> <li>• Small scale grade 3 agricultural land</li> <li>• Minerals Consultation Zone</li> </ul> <p>Negative impact</p> <ul style="list-style-type: none"> <li>• Small scale grade 1-2 agricultural land</li> <li>• Large scale grade 3 agricultural land</li> </ul>	

Sustainability objective	Elements covered	Pre-Mitigation	Post-Mitigation
		<ul style="list-style-type: none"> <li>Contaminated land</li> </ul> Significant Negative Impact <ul style="list-style-type: none"> <li>Large scale grade 1-2 agricultural land</li> </ul> <i>Small scale = &lt;20ha</i> <i>Large scale = &gt;20ha</i>	
E) Promoting economic growth and employment	Increasing jobs; reducing out-commuting; skills training; growth of rural businesses; tourism provision	Significant positive impact <ul style="list-style-type: none"> <li>Large scale commercial development</li> </ul> Positive impact <ul style="list-style-type: none"> <li>Small scale commercial development</li> </ul> Slight positive impact <ul style="list-style-type: none"> <li>Large scale residential development</li> </ul> Neutral impact <ul style="list-style-type: none"> <li>Small scale residential development</li> </ul> Negative impact <ul style="list-style-type: none"> <li>Small scale loss of commercial development</li> </ul> Significant negative impact <ul style="list-style-type: none"> <li>Large scale loss of commercial development</li> </ul> <i>Small scale = &lt;100 dwellings / 10,000sqm</i> <i>Larger scale = &gt; or equal to 100 dwellings /10,000sqm</i>	
F) Supporting retail	Safeguarding the vitality and viability of town centres; relationship between new development and town centres	Significant positive impact <ul style="list-style-type: none"> <li>Commercial development within a town centre</li> </ul> Positive impact <ul style="list-style-type: none"> <li>Large scale residential development within a town (&gt; or equal to 100 dwellings)</li> </ul> Slight positive impact <ul style="list-style-type: none"> <li>Small scale residential development within a town (&lt; 100 dwellings)</li> </ul> Neutral impact <ul style="list-style-type: none"> <li>Commercial development outside of a town centre</li> <li>Residential or commercial development within a village</li> </ul>	
G) Meeting	Supply of housing;	Significant positive impact	

Sustainability objective	Elements covered	Pre-Mitigation	Post-Mitigation
housing needs	housing mix; house size; housing affordability; appropriate housing density to location; proximity to services and facilities	<ul style="list-style-type: none"> <li>• Residential large scale development</li> </ul> Positive impact <ul style="list-style-type: none"> <li>• Residential medium scale development</li> </ul> Slight positive impact <ul style="list-style-type: none"> <li>• Residential small scale development</li> </ul> Neutral impact <ul style="list-style-type: none"> <li>• Commercial development</li> </ul> <i>Small scale = 1-19 dwg</i> <i>Medium scale = 20-99 dwg</i> <i>Large scale = 100+dwg</i>	
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	Positive impact <ul style="list-style-type: none"> <li>• Provides a community service</li> </ul> Slight positive impact <ul style="list-style-type: none"> <li>• Town sites - walking distance to services</li> </ul> Neutral impact <ul style="list-style-type: none"> <li>• Village sites - designated village</li> </ul> Slight negative impact <ul style="list-style-type: none"> <li>• Pollution</li> <li>• Town sites – beyond walking distance to services</li> <li>• Village sites - not a designated village</li> <li>• Village sites – designated village but large development e.g. 100+ housing</li> <li>• Requires footpath provision</li> <li>• Loss of undesignated recreational land</li> <li>• Impact but not loss of designated open space</li> </ul> Negative impact <ul style="list-style-type: none"> <li>• Loss of a community service</li> <li>• Loss of a designated Local Green Space</li> <li>• Large site which will require new community services and facilities</li> </ul>	
I) Delivering	Roads and	Positive impact	



Sustainability objective	Elements covered	Pre-Mitigation	Post-Mitigation
the necessary infrastructure	transportation; schools; health services; community facilities; green infrastructure; telecommunications	<ul style="list-style-type: none"> <li>• Significant infrastructure e.g. relief road</li> </ul> Slight positive impact <ul style="list-style-type: none"> <li>• Green infrastructure is provided</li> </ul> Neutral impact <ul style="list-style-type: none"> <li>• Access is achievable</li> <li>• School has capacity for additional development</li> </ul> Slight negative impact <ul style="list-style-type: none"> <li>• No infrastructure provided, small site (&lt;100 dwellings/10,000sqm)</li> <li>• School is at capacity, places can be supported through developer contributions</li> <li>• Access is achievable but would require additional works</li> </ul> Negative impact <ul style="list-style-type: none"> <li>• School is at capacity, development proposed would require a new school</li> </ul>	

This update to the Sustainability Appraisal is set out as follows:

**Annex 1 – Sustainability Appraisal text, methodology and cumulative impact comments (p.10 – 23)**

This annex sets out comments from the Local Plan Review Proposed Submission Consultation (2015) on the contents of the sustainability appraisal (SA) text, methodology and cumulative impacts.

**Annex 2 – Further reasonable alternatives, new information and comments on the sustainability appraisal of policies and sites (p.24 – 165)**

This annex provides a summary of additional reasonable alternatives considered and proposed changes to the sustainability appraisal for example through new information. Minor proposed changes to the Local Plan have not been assessed as these were deemed to not give rise to significant effects.

**Annex 3 – Additional Reasonable Alternative Appraisals (p.166 – 337)**

This annex provides the full appraisals used to assess reasonable alternatives where deemed necessary as summarised in Annex 2.

**Annex 4 – Non technical summary and overall sustainability appraisal of Plan (p.339 – 345)**

This annex summarises the main changes made to the Local Plan Review following the appraisal of alternatives set out in Annex 2 and assesses the overall sustainability of the proposed Local Plan.

## **Annex 1 – Sustainability Appraisal text, methodology and cumulative impact comments**

This annex sets out comments from the Local Plan Review Proposed Submission Consultation (2015) on the contents of the sustainability appraisal (SA) text, methodology and cumulative impacts.

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## Comments on Sustainability Appraisal text

Comment	Comments made by (customer ID in brackets)	Impact on the Sustainability Appraisal
1. <i>'Would like to see reference to NCN3 National Cycle Network Route no.3, Devonshire Heartland Way, the Little Dart Ridge &amp; Valley Walk and the Tarka Trail.'</i>	Bampton Society (1319)	All public rights of way and cycling and walking routes are already noted with some examples provided. The suggested additional text adds unnecessary detail.
2. <i>'No evidence as to how the SA has used the Water Framework Directive in the appraisal of the plans policies.'</i>	Environment Agency (943)	The Water Framework Directive forms part of the sustainability considerations for objective D) Safeguarding and minimising resource use as set out on p.28 of the SA. It has also been considered as part of the Strategic Flood Risk Assessment which has informed the SA.
3. <i>'Paragraph 2.4 provides little reference to Green Infrastructure.'</i>	Environment Agency (943)	The comment is noted and the following sentence is proposed as an addition to paragraph 2.4. <i>'Green infrastructure is a network of multi-functional green space, urban and rural which is capable of delivering a wider range of environmental and quality of life benefits for local communities.'</i>
4. <i>'Paragraph 2.30 should include white clawed crayfish as a species of particular note in Mid Devon.'</i>	Environment Agency (943)	The comment is noted and the following sentence is proposed as an addition to paragraph 2.30. <i>'Mid Devon is also home to white clawed crayfish. It includes the only two remaining populations of this species in Devon, representing the furthest south-west UK</i>

Comment	Comments made by (customer ID in brackets)	Impact on the Sustainability Appraisal
		<i>distribution.'</i>
5. <i>'Paragraph 2.58 should consider the SUDs hierarchy and their multi-functional potential.'</i>	Environment Agency (943)	The comment is noted and the following sentence is proposed as an addition to paragraph 2.58. The proposed change also recognises national policy changes. <i>'From 6 April 2015, all major development will have to incorporate sustainable drainage to manage surface water runoff, unless demonstrated to be inappropriate. Devon County Council as the Lead Local Flood Authority in the area is the statutory consultee on major planning applications for surface water management. SuDs are designed to mimic the natural drainage of surface water by managing rainfall close to the site where it falls. The SuDs hierarchy should be considered when drawing up options for SuDs in which in general soft landscape SuDs are preferred which also provide other multi-functional potential e.g. green infrastructure.'</i>
6. <i>'Paragraph 4.4 refers to 7,200 dwellings as objectively assessed need indicated by the SHMA. SHMA provides a range of figures therefore 7,200 is the 'policy on' figure and not objectively assessed need. Would welcome clarification'.</i>	Devonshire Homes Ltd c/o Jillings Hutton (1050); Pemberton Hutton Developments c/o Jillings Hutton (5786); Mr R Persey C/O Jillings-Hutton	The 7200 figure reflected the latest SHMA evidence at the time of the proposed submission Local Plan Review publication. An update to the SHMA provides a final objectively assessed housing need (OAN) mid-range figure of 380. As such the OAN of the district has been increased to 7600 in response to this new evidence. An addition of

Comment	Comments made by (customer ID in brackets)	Impact on the Sustainability Appraisal
	(4654)	260 dwellings is proposed in response to the proposed allocation of a strategic scale employment site at Junction 27. The figures are therefore proposed to be amended to a total of 7860 dwellings equating to 393 dwellings per annum. Alternatives for the amount of housing development are set out in annex 2.
7. <i>'SA vision and objectives reflect aspirations of local community, the Council and the ambitions of the NPPF.'</i>	Pegasus Planning (3678)	Support noted. No changes to the SA required.
<b>Summary</b>		
Additions to the text of the SA are proposed to add context to the report and reflect the most up to date information.		

## Comments on the Sustainability Appraisal methodology

Comment	Comments made by (customer ID in brackets)	Impact on the Sustainability Appraisal
<b>General methodology comments</b>		
1. A comment was made which argued that the <i>'scoring of the SA is subjective.'</i>	Mr Christian & Mr Force & Mr Christian C/O Genesis Town Planning (3780)	The scoring is based on professional planning judgements using the best available evidence at the time of the Sustainability Appraisal. Some level of subjectivity is recognised in the Mid Devon Sustainability Appraisal methodology. However to ensure as much consistency as possible, when scoring proposed site allocations an appraisal guidance was followed as set out on p.191 of the 2015 Proposed Submission Local Plan Review SA.
2. A comment was made which argued that the <i>'scores in the SA ignore the absolute size of the site alternatives which must distort their impact e.g. larger sites should have a bigger impact than smaller sites.'</i>	Mr Christian & Mr Force & Mr Christian C/O Genesis Town Planning (3780)	The SA is a tool to understanding the sustainability of a site or proposal. It also provides the opportunity to compare alternatives however context should be considered when interpreting the SA findings. For example, strategic sites were compared against other alternative strategic sites whereas small rural sites were compared against other alternative small rural sites. A single small scale rural site would not be seen as an alternative to a strategic allocation.
3. A comment was made which stated that the <i>'SA does not comment on site deliverability in terms</i>	Mr Christian & Mr Force & Mr Christian C/O Genesis	The SA is one tool to assess the sustainable performance of a proposed policy or proposal and does not cover all

Comment	Comments made by (customer ID in brackets)	Impact on the Sustainability Appraisal
<i>of phasing and meeting housing need.'</i>	Town Planning (3780)	elements to be considered in deciding preferred policies/proposals. The site options presented in the SA have been through a SHLAA panel which has considered their deliverability in principle. Undeliverable sites are referenced in appendix 3.
4. A comment was made which suggested that the <i>'the total scores should be summed to produce a total score which will allow comparisons between total scores.'</i>	Individual (4447)	The aim of the SA is to identify and respond to significant effects on various objectives. As noted in paragraph 3.10, the reason stated for not providing the total scores is because this can lead 'artificial certainty' in determining the effect of a policy or proposal where the impacts of issues can be complex. This is endorsed by the Planning Advisory Service.
5. A comment was made which argued that the <i>'post-mitigation score is unreliable and unrealistic'</i> .	Individual (4447)	The aim of the SA is to identify and respond to significant effects on various objectives. Reasons for post-mitigation score are provided under the mitigation heading in the SA tables. Where there is an element of uncertainty this has been recognised through '?' within the table itself, this approach is common in sustainability appraisal work. The scoring is based on professional planning judgements using the best available evidence at the time of the Sustainability Appraisal.
6. Representations were made for the following sites:	Individuals (4447, 5208, 4106, 5234, 4081, 5263,	No change to the SA. It is a regulatory requirement to appraise alternative options.



Comment	Comments made by (customer ID in brackets)	Impact on the Sustainability Appraisal
<ul style="list-style-type: none"> <li>• OHA1 Land at Blundells Road, Halberton</li> <li>• OMO1 Tatepath Farm, Morchard Bishop'</li> <li>• OMO2 Church Street, Morchard Bishop (locally known as the Gurneys)</li> </ul> <p>In which the representations supported the exclusion of the site but request it be removed from the SA as an alternative option.</p>	<p>4117, 5295, 3971, 4082, 4416, 4459, 5642, 5641, 4093, 5604, 5605, 5606, 5607, 5608, 4474, 4473, 5609, 4476, 4108, 4111, 4112, 5603, 4460, 4152, 4110, 4481, 4475, 5599, 4101, 4363, 5594, 4105, 5597, 5598, 5600, 4471, 4472, 5592, 5593, 4077, 4074, 5595, 5596, 5601, 6063, 4212, 4215, 4681, 4682, 4075, 5590, 5591, 5586, 5587, 5588, 5589, 4076, 5358, 4356)</p>	
<p>7. A question was raised regarding the amendment to the scoring of the objectives in the proposed submission SA when compared to the options stage SA. Specific comments made to this regard on objectives A, D and H' of OHA1 Halberton, Land at Blundells Road.</p>	<p>Individual (4447)</p>	<p>Comments were invited on the sustainability appraisal at the Options consultation stage 2014. The SA is an iterative process which is updated as new evidence arises. Amendments were made to the SA to respond to the representations accordingly. Comments included local knowledge of existing sites. Comments were also made on the need for consistent scoring throughout the SA based on similar parameters e.g. scoring similar locations equally</p>

Comment	Comments made by (customer ID in brackets)	Impact on the Sustainability Appraisal
		across Mid Devon. As such the methodology was strengthened by setting out guidance for appraising site allocations (p.192) to ensure consistent scoring throughout the amended SA. This has resulted to amendments to some commentaries and scoring throughout the SA.
<b>Policy specific methodology comments</b>		
<b>S2 Amount and Distribution of development</b>		
8. A comment was made which noted that <i>'two alternative options for villages were considered as 1,600 and 1,040 scenarios. The Local Plan Review considers 720 with no justification.'</i>	Devonshire Homes Ltd c/o Jillings Hutton (1050); Pemberton Hutton Developments c/o Jillings Hutton (5786); Mr R Persey C/O Jillings-Hutton (4654)	The two alternative scenarios in the options Local Plan Review consultation were based on the most recent available data at that time which was a figure greater than the objectively assessed need. A SHMA update provided an interim figure of 7,200 dwellings to meet the objectively assessed need (OAN). As a result the total housing need figure was reduced from 8,400 to 7,200 dwellings in the proposed submission report with the rural distribution reduced proportionately in line with the reduction in total figure. Along with this change, further site specific evidence across Mid Devon District resulted in amended distribution figures to reflect the most recent evidence available. The SHMA figure has been further amended in a final iteration of the document in which a concluded 7,600 dwellings has been considered for Mid

Comment	Comments made by (customer ID in brackets)	Impact on the Sustainability Appraisal
		Devon, an additional 260 dwellings is proposed in response to the strategic employment allocation at Junction 27 with amended distribution figures to follow.
<b>CU14 Ware Park and Footlands, CU15 Land at Exeter Road &amp; CU21 Land at Colebrook Contingency Site</b>		
<p>9. A comment was made which noted that they <i>'object to allocation [CU14] as sustainability appraisal scoring for site is less than CU21 Colebrook and therefore this site should be contingency instead, with CU21 as full allocation....SA and allocated sites at Cullompton do not correlate. Total scores of CU14 and CU15 are less positive than CU21'</i>.</p>	<p>Mr Christian &amp; Mr Force c/o Genesis Town Planning (3780)</p>	<p>As set out on p.28 para 3.10 of the SA 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 complex. This is endorsed by the Planning Advisory Service. It is also important to note that the SA is one tool for decision making and does not cover all elements to be considered in deciding preferred policies/proposals. Bearing this in mind, CU21 is of an appropriate scale required to be effective as a contingency site, it scores more positively on objective E) promoting economic growth and employment and G) meeting housing needs predominantly due to its size. CU14 and CU15 are not comparable to CU21 in size in which they are not of a scale which would provide the quantum of development required to be effective as a contingency site. CU21 is still considered deliverable hence its proposed allocation as a</p>

Comment	Comments made by (customer ID in brackets)	Impact on the Sustainability Appraisal
		contingency site but it is not allocated as one of the main sites for Cullompton as other allocations are strategically preferable.
<b>CF2 Land adjacent School and OCF2 Landboat Farm</b>		
10. A representation was made during the Local Plan Review Proposed Submission consultation and stated that they <i>'Disagree with comparison of site OCF2 'Landboat Farm' with CF2 'Land adj school'. States SA should be comparing new sites outside the current settlement boundary, and exclude any parts of sites within the boundary'</i> .	Garside Planning Services (3645)	The SA appraises the potential benefits and impacts of all sites put forward for development. It would be inappropriate to exclude a part of a site on the basis that it lies within the settlement limit as this would lead to an incomplete analysis of benefits/impacts, and preclude opportunities to recommend mitigation. Such omission could also potentially leave the local authority at risk of not fulfilling the regulatory requirements set by the EU Strategic Environment Assessment directive to fully assess the impact of plans and proposals. No change to the SA is proposed.
<b>Summary</b>		
It is considered that none of the comments made would result in any changes to the Sustainability Appraisal for reasons set out in the 'Impact on the Sustainability Appraisal' column above.		

## Comments on secondary/ cumulative/ synergistic effects

The comments in the table below are considered to update the cumulative effects noted in appendix 2 and 3 of the Local Plan Review Proposed Submission sustainability appraisal (2015).

Comment	Comments made by (customer ID in brackets)	Impact on the Sustainability Appraisal
<b>Tiverton</b>		
<p>1. A comment was made on strategic policy S10 Tiverton which stated the following: <i>'support strategy in general, however further work is needed on the transport evidence in relation to the SRN. There should be reference to the cumulative impact of development on the M5'</i>.</p>	Highways England (1172)	The cumulative impact of developing at Tiverton was previously identified in the SA in the cumulative/secondary/synergistic effects section of the proposed allocations in terms of identifying the potential to impact upon traffic. However the comment made is specific to J27, in response to this additional detail is provided to the supporting text of the plan under policy S10.
<b>OTIV2 Hartnoll Farm</b>		
<p>2. A comment was made which stated the following: <i>'object to exclusion – site could provide substantial proportion of Tiverton and district's housing need. New junction designed to accommodate up to 2000 dwellings'</i>.</p> <p>While it may be possible for the proposed grade</p>	Waddeton Park Ltd (3815) and officer comment.	The Blundells School site is proposed to be allocated in the Local Plan Review as a modification to the plan for 200 dwellings. The provision of a junction on Heathcoat Way and a safeguarded road route through the site to serve as a future second strategic road access for development at Tiverton eastern urban extension is proposed in the draft policy. This enables mitigation for any future cumulative

<p>separated junction onto the A361 to accommodate up to 2000 dwellings, the allocation commented on would take the number of new dwellings to the East of Tiverton to well in excess of 2000. This would necessitate the relief road behind Blundells School. Although this need was recognised in previous iterations of the SA, it did not clearly set out that the requirement for this relief road would be due to this cumulative effect of additional development in excess of 2000 dwellings to the East of Tiverton.</p>		<p>impacts of potential additional development to the East of Tiverton. Without the relief road further allocation which cumulatively would result in excess of 2000 dwellings to the East of Tiverton would lead to unacceptable impacts on Blundells Road and the village of Halberton.</p>
<p><b>Cullompton</b></p>		
<p>3. The SA recognised the potential cumulative impact on the road network of developing at Cullompton. Some policies had reflected this impact through additional criterion in policy. Since the Local Plan Proposed Submission (2015) the highway authority has provided more information regarding the cumulative impact on the highway network.</p>	<p>Officer comment</p>	<p>In response to this various policies have included additional criterion to reflect this cumulative impact including CU6 North West Cullompton phasing, CU13 Knowle Lane, CU14 Ware Park and Footlands, CU15 Land at Exeter Road, CU16 Cumming Nursery, CU17 Week Farm and CU18 Venn Farm.</p>
<p><b>Crediton</b></p>		
<p>4. The SA did not previously fully consider the impact on Crediton high street through</p>	<p>Officer comment</p>	<p>The cumulative impact of developing to the west of the town was not previously clearly identified in the SA in</p>

<p>developing on the west of the town. Developing on the west would increase traffic through the high street as most likely destinations for journeys are either Exeter or Tiverton. Whilst some mitigation could be provided, the impact of developing sites on the east side of the town is likely to be much lesser than any on the west.</p>		<p>which incremental development in the west of the town will have a cumulative negative effect on the traffic through the high street with a secondary impact on air quality. This would impact the scores for the preferred alternative CRE9 Alexandra Close, alternative OCRE10 Westwood Farm and OCRE11 Land at Chapel Down Farm given their context to the west of the town. The amendments to scoring for these alternatives are discussed in annex 2.</p>
<p><b>CRE5 Pedlerspool and CRE7 Stonewall Lane</b></p>		
<p>5. A representation was made during the Local Plan Review noted the need to <i>'cumulatively assess the transport impacts of CRE5 and CRE7'</i>.</p>	<p>MJ Gleeson c/o Bell Cornwell LLP (3775)</p>	<p>The plan already recognises the potential for cumulative transport impacts in CRE5 however this is not set out clearly in CRE7, therefore in response to this representation a change to the Plan has been proposed to include in the supporting text of CRE7 the need for a Transport Assessment, which comprehensively assesses the transport issues related to development of the site, taking into account the potential cumulative impact of nearby allocations.</p>
<p><b>OJ27 Commercial Development</b></p>		
<p>6. The SA did not previously fully consider the secondary effect of requiring additional housing to be allocated in response to the creation of</p>	<p>Officer comment</p>	<p>OJ27 Commercial Development would require additional housing to be allocated in response to the creation of additional jobs. This should be considered alongside any</p>

additional jobs as set out in para 159. of the NPPF and supporting paragraph in the NPPG.		additional commercial development proposed at OJ27.
7. A Habitat Regulations Assessment update of the Local Plan Review including the Junction 27 option is required.	Officer comment	A Habitat Regulations Assessment of the Mid Devon Local Plan Review including Junction 27 has been undertaken which concludes that the J27 site allocation, alone or in combination with the Local Plan proposals, will not have an adverse effect on the integrity of the Culm Grasslands SAC.
<b>Summary</b>		
<p>The comments set out in this table identify cumulative/secondary/synergistic effects which were not previously clearly set out in the Proposed Submission SA. The impacts of note include the addition of a criterion in the proposed allocation Blundells School to enable mitigation for any potential future development to the East of Tiverton. The cumulative negative effect on traffic through the high street in Crediton and secondary effect on air quality from incremental development in the west of the town. The need for a transport assessment associated with CRE7 Stonewall Lane to take account of the potential cumulative impact of nearby allocations and the secondary impact of allocating OJ27 Commercial Development in which additional housing will be required in response to the creation of additional jobs.</p>		



## **Annex 2 – Further reasonable alternatives, new information and comments on the sustainability appraisal of policies and sites**

The level of detail provided in the updated assessment of reasonable alternatives, new information and comments on the sustainability appraisal of policies and sites is correlated with the significance of the alternative proposed. A breakdown of the types of alternatives considered in this annex along with the level of detail of the updated assessment that might be expected is provided below.

<b>Alternatives considered</b>	<b>Full Appraisal</b>	<b>Summary Matrix</b>
<b>Distinct alternatives:</b> where alternatives are distinct from the preferred policy. Full appraisals are provided in annex 3. A summary matrix is also provided under each policy where relevant.	✓	✓
<b>Indistinct alternatives:</b> where alternatives are indistinct. Full appraisals are not provided unless three or more objectives of the SA are proposed to be amended. A summary matrix is provided under each policy where relevant.	✓/✗	✓
<b>New information:</b> where new information is presented this has been discussed in the tables throughout this annex. The detail of the updated SA assessment will depend on the significance of the new information proposed.	✓/✗	✓
<b>Deleted Policies:</b> where policies are proposed to be deleted, the impact on the sustainability of the Plan is discussed within the relevant table in this annex.	✗	✗
<b>SA amendments:</b> all comments made on the SA with regard to the Local Plan Review Proposed Submission policies are discussed in this annex.		
<ul style="list-style-type: none"> <li>Where no change to the SA is proposed a full appraisal/summary matrix has not been provided. The reason for no change is fully discussed in the tables in this annex.</li> </ul>	✗	✗
<ul style="list-style-type: none"> <li>Where there are two or fewer changes proposed to the post-mitigation score, summary matrices are provided. Full appraisals are not provided; reasons for the changes to the SA are fully discussed within the tables in this annex.</li> </ul>	✗	✓
<ul style="list-style-type: none"> <li>Where three or more amendments are proposed to the post-mitigation score a summary of the changes are discussed within the tables in this annex along with a summary matrix. Full appraisals are provided in annex 3 which set out the impact in more detail.</li> </ul>	✓	✓

Examples of alternatives that are not considered in this annex are provided below:

<b>Alternatives not considered</b>
<b>Previous alternatives:</b> alternatives that have been previously considered as part of previous iterations of the SA have not been reconsidered in this annex unless amendments have been suggested for that alternative.
<b>Minor alternatives:</b> alternatives proposed which would not give rise to any impact on the SA scoring.
<b>Non-specific alternatives:</b> alternatives suggested which are insufficiently detailed to assess the impact on the SA.
<b>Other SA amendments:</b> suggested changes to the SA text, methodology, secondary/ cumulative/ synergistic impacts are discussed in annex 1.
<b>Unreasonable alternatives:</b> where the suggested change would not be possible or would be unreasonable to implement.

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## **Strategic Policies**

### **S1 Sustainable Development Principles**

Two comments under S1 are considered to give rise to an alternative to be considered in this annex. Although comments were made on S1, both comments would result in a rural focussed alternative option for the distribution of development which is considered under S2 in this annex.

### **S2 Amount and Distribution of development**

<b>Reasonable Alternative Proposed (Amount Housing)</b>	<b>Impact on the Sustainability Appraisal</b>
<p>A variety of alternatives have been proposed by representations for housing development these range from 7400 and 8860. To enable meaningful comparisons to be made the following alternatives of 7200, 7600, 8000, 8400, 8800 have been considered with full assessments set out in annex 3 and summary matrices provided below. An alternative of 7860 has also been considered which is the Council's preferred option for the amount of housing development and is proposed as a modification to the plan. This is to reflect the updated evidence to meet the objectively assessed need of 7600 in the District and the preferred strategy of allocating commercial development at J27, of which an addition of 260 dwellings is proposed to reflect the projected job growth as a result of the commercial proposals at J27.</p>	
1. A lower growth alternative of 7200.	<p>This was previously appraised as part of the Proposed Submission Local Plan in which this figure was believed to meet the objectively assessed need. New evidence has demonstrated that this figure would not meet this need; as such this would result in a lower growth scenario. Whilst this scenario would meet a large proportion of the housing needs of the district it would not meet the whole need and therefore a positive rather than significant positive impact is considered for objective G) meeting housing needs. All other objectives considered in the SA score the same as the 'meet the</p>

	housing need' alternative of 7600.
2. A meet the housing need alternative of 7600.	This alternative scores more positively on all objectives in comparison to other alternatives. It has the same scoring as the previous preferred alternative 7200 in the Proposed Submission SA as this was previously thought to meet the objectively assessed need. The scoring of the 7200 alternative now scores lower for objective G) meeting housing needs as explained above.
3. Preferred alternative: A meet the housing need alternative 7600 with Junction 27 additional housing requirements of 260, a total of 7860.	The sustainability of this alternative is considered to fall between the alternatives 7600 and 8000. The proposed change to the housing amount is not considered significant enough to enable a meaningful comparison; as such it is considered that the alternative of 7860 will score the same as alternative 2. Given the similarities of this alternative to 7600, no additional full appraisal has been provided in annex 3. This alternative meets the objectively assessed housing needs and does not score lower in objective I) (as reflected for the intermediate higher growth alternative of 8000) because the proposed additional sites for development have been set out at Blundells School, Tiverton and Higher Town, Sampford Peverell respectfully and it is considered that infrastructure required for the additional sites can be provided in-step with development. For completeness although this alternative scores the same as alternative 2 a full appraisal is provided in annex 3.
4. An intermediate higher growth alternative of 8000.	This alternative has a lower score in comparison to the preferred alternative for objective I) delivering the necessary infrastructure in which it may be more difficult to distribute development between the

	towns while delivering the necessary infrastructure in-step.
5. A higher growth alternative of 8400.	In comparison to the preferred alternative this scenario would result in a slight negative effect for objective A) protection of the natural environment where a higher growth scenario may be more difficult to distribute across the district whilst avoiding environmental impacts on the landscape. A significant negative effect for objective D) safeguarding and minimising resource use in which this option is likely to require further greenfield developments and a negative effect for objective I) delivering the necessary infrastructure where a higher growth scenario is also likely to be more difficult to distribute across the district while delivering the necessary infrastructure.
6. An elevated higher growth alternative of 8800.	In comparison to the preferred alternative, this scenario would result in a negative effect for objective A) protection of the natural environment where a higher growth scenario may be more difficult to distribute across the district whilst avoiding environmental impacts on the landscape and in this scenario the additional development would be of an equivalent scale to a strategic allocation. A significant negative effect for objective D) safeguarding and minimising resource use in which this option is likely to require further greenfield developments and a negative effect for objective I) delivering the necessary infrastructure where a higher growth scenario is also likely to be more difficult to distribute across the district while delivering the necessary infrastructure.
<b>Reasonable Alternative Proposed (Distribution Housing)</b>	
7. A rural distribution alternative.	A rural distribution alternative has appraised with a full appraisal

<p>A representation was made during the Local Plan Review Proposed Submission consultation and noted that <i>'the policy should reduce the Cullompton target to 1,500 dwellings and increase the Rural Areas target to 2,820 dwellings.'</i> A comment was also made on the SA which commented that the SA <i>'should have a distribution scenario of a wider distribution to the larger villages.'</i></p> <p>In response to these representations a rural distribution alternative has been appraised.</p> <p>An alternative to <i>'increase the amount of development at Crediton and rural areas whilst reducing the amount in Cullompton as major development sites are risky'</i> was also suggested. To respond to this comment, an alternative of removing East Cullompton leading to a redistribution of 2100 dwellings in Crediton and across rural areas was considered. As the maximum capacity of Crediton is 1047 based on the highest capacity of all potential allocation sites submitted through the SHLAA this would only provide an addition of 327 dwellings at Crediton with the remainder distributed in rural areas. Therefore this scenario would result in the same SA outcomes as the 'rural distribution' alternative and therefore has not been appraised as a separate alternative.</p>	<p>provided in annex 3 and a summary matrix provided below. The findings of this SA show that this would lead to greater negative effects in objectives: A) natural environment, B) the built and historic environment, C) climate change, E) promoting economic growth and employment, H) ensuring community health and wellbeing and I) delivering the necessary infrastructure. A slightly less negative score was considered for objective D) safeguarding and minimising resource use as the majority of the village allocations were identified as grade 3 agricultural land rather than grade 1 or 2, although a negative effect overall remains for this objective.</p>
<p>8. A Tiverton and Crediton focussed alternative.</p> <p>A representation was made during the Local Plan Review Proposed Submission consultation and noted that <i>'the distribution</i></p>	<p>A Tiverton and Crediton focussed alternative has appraised with a full appraisal provided in annex 3 and a summary matrix provided below. In comparison to the preferred option, this would result in a greater</p>

<p><i>should be altered to reduce Cullompton provision to reflect the removal of the East Cullompton proposal and Crediton should be increased to reflect its size. Difficulties of bringing forward sites such as the East Cullompton one are well known. Crediton has scope for additional development’.</i> The removal of East Cullompton implies a target of 1500 at Cullompton and 2820 at Crediton which is not a reasonable alternative as there is not the quantum of sites available in Crediton to deliver this option. The maximum capacity for Crediton based on taking the highest capacity of all potential allocation sites submitted through the SHLAA is 1047 dwellings. As an alternative to the rural distribution alternative (discussed above), a Tiverton and Crediton focussed alternative with greater development in rural areas has been considered.</p>	<p>negative impact in objectives: A) natural environment, B) built and historic environment, E) promoting economic growth and employment. The option scores slightly higher in F) supporting retail and H) ensuring community health and wellbeing.</p>
<p>9. A Town focussed alternative.  A representation was made during the Local Plan Review Proposed Submission consultation and suggested the following distributions:  <i>Tiverton – 3510</i>  <i>Cullompton – 2730</i>  <i>Crediton – 780</i>  <i>Rural Areas – 780</i>  <i>Total – 7800</i></p> <p>The distribution of this representation is very similar to that</p>	<p>No change.</p>



<p>previously appraised under the ‘town focus’ option albeit with different total development proposed. Alternatives for the total development have been considered separately in this table with a summary matrix provided below. The original summary matrix for the ‘town focus’ alternative has also been provided below for information.</p>	
<p><b>Reasonable Alternative Proposed (Amount Commercial)</b></p>	
<p>10. Higher Growth Scenario including J27 option  With the addition of a strategic scale employment site at junction 27 on the M5 motorway the higher commercial growth scenario has been reappraised. This scenario takes into account the opportunities provided by the Junction 27 option.  A full appraisal the higher growth scenario including the J27 option is provided in annex 3. The site specific appraisal of the junction 27 option is provided in the allocation section of this annex. No other alternatives are available and deliverable that could accommodate the quantum development proposed.</p>	<p>Given this option is intricately linked with the proposed Junction 27 allocation modifications option, the scoring for this alternative is the almost identical as the Junction 27 site appraisal with the exception of objective H) ensuring community health and wellbeing as well considering the policy as a whole, the option enhances existing policy as it broadens the potential use classes including development for healthcare, education and public facilities, overall it therefore scores positively.</p>
<p><b>New Information</b></p>	
<p>11. New information was made available during the consultation on the Local Plan Review Proposed Submission. Upon review, it is proposed to increase the objectively assessed housing need to 380 per year to reflect the advice in the SHMA.</p>	<p>As noted above, this alternative to ‘meet the housing need’ would result in the same SA scores as previously anticipated for the previously considered OAN 7200. The previously considered OAN of 7200 now scores lower in objective G) meeting housing needs, as whilst this scenario would meet a large proportion of the housing needs of the district it would not meet the whole need, and therefore</p>

	a positive rather than a significant positive impact is considered for this objective.
12. Additional evidence since the previous SA was commissioned specifically to examine the potential demographic implications of the proposed strategic scale employment site at junction 27 on the M5 motorway. The results suggest a need of an additional 260 dwellings within Mid Devon District Council over the plan period.	In response to this new information a meet the housing need alternative of 7600 with an additional 260 in response to the inclusion of a strategic scale employment site at junction 27 of the m5 has been considered. This would result in an alternative of 7860 dwellings which has been considered above.
<b>Sustainability Appraisal Comments</b>	
13. A representation was made during the Local Plan Review Proposed Submission consultation and commented that <i>'8,400 dwellings shouldn't trigger a slight negative effect on the environment when 7,200 dwellings have a neutral effect'</i> . Devonshire Homes Ltd c/o Jillings Hutton (1050); Pemberton Hutton Developments c/o Jillings Hutton (5786); Messrs Persey and Harding c/o Jillings-Hutton (4654)	The scores are in the context of the policy. In this case, it is based on development figures. To enable meaningful comparison between the options for policy S2 it was judged that when comparing 7,200 dwellings with 8,400 dwellings in terms of overall growth of the district, the provision of an addition of 1,200 dwellings would have a slightly more negative effect. No change to the SA is proposed.
14. A representation was made during the Local Plan Review Proposed Submission consultation and commented that <i>'Benefits of 'supporting retail' in having more houses and therefore more spending power is not highlighted in relation to higher growth scenario'</i> . Devonshire Homes Ltd c/o Jillings Hutton (1050); Pemberton Hutton Developments c/o Jillings Hutton (5786); Messrs Persey and Harding c/o Jillings-Hutton (4654)	It was judged that as the impact on supporting retail would be a secondary impact, the significance of increasing dwellings in relation to a higher growth scenario in comparison to the preferred scenario did not warrant an increased retail score. However it has been recognised for all alternatives that the overall provision of 7200 dwellings and above would have a slight positive effect on objective F) supporting retail, as this would increase the number of shoppers in the District and contribute towards enhancing shopping areas in Town Centres. No change to the SA is proposed.
15. A representation was made during the Local Plan Review Proposed Submission consultation and commented that they	Comment is noted, no change to the SA is proposed.

<p><i>‘Support the conclusions of the SA that the most appropriate growth strategy is to focus development in sustainable urban locations rather than seeking growth in larger villages’.</i></p> <p>Pegasus Planning (3678)</p>	
<p>16. A representation was made during the Local Plan Review Proposed Submission consultation and commented that <i>‘The SA recognises the level of supply is not anticipated to meet the need for affordable housing. Therefore deliverable sites should be seriously considered’.</i></p> <p>Devonshire Homes Ltd c/o Jillings Hutton (1050); Messrs Persey and Harding c/o Jillings-Hutton (4654)</p>	<p>Comment on the proposed submission SA has been noted. A change to the Plan is proposed in which the overall target is proposed to be increased to 7,860, which would yield 110 affordable dwellings per year at 28%. The SHMA forecasts a need of 124 affordable dwellings per year, which it is accepted should be reflected in the local plan text. It is highly likely that the Council and its housing association partners will be able to provide at least 20 additional affordable dwellings per year through non-planning actions such as investment from the HCA, exceptions sites and delivery on council owned land and meet the affordable housing need. Alternatives for the amount of residential development are discussed above.</p>
<p>17. A representation was made during the Local Plan Review Proposed Submission consultation and commented that <i>‘Two alternative options for villages were considered as 1,600 and 1,040 scenarios. The Local Plan Review considers 720 with no justification’.</i></p> <p>Devonshire Homes Ltd c/o Jillings Hutton (1050); Pemberton Hutton Developments c/o Jillings Hutton (5786); Messrs Persey and Harding c/o Jillings-Hutton (4654)</p>	<p>The total housing figure in the ‘options Local Plan Review consultation’ was based on the most recent available data at that time. More recent evidence at the time of publication resulted in a reduced total housing figure of 8,400 to 7,200 dwellings. The distribution to rural areas was also reduced proportionately relative to the total housing figures along with further site specific evidence which affected the distribution figures. The SHMA figure has been further amended in a final iteration of the document in which a concluded 7,600 dwellings have been considered for Mid Devon with amended distribution figures to follow. No additional changes to the</p>

SA are proposed.

## Changes to the Plan

### Amount of development (housing)

Alternative 3 is suggested as a modification to the plan which would result in a 7,860 dwelling target. This alternative is preferred as new information in the finalised SHMA report which became available during the consultation on the Local Plan Review Proposed Submission resulted in new evidence, providing a final objectively assessed housing need (OAN) 380 per year. It is therefore agreed the target will need to be increased to 7,600 to meet the OAN of the district. As a result, the previously proposed approach of 7,200 dwellings over the plan period is no longer preferred as this approach would not meet the OAN of the district. In response to the proposed allocation of a strategic scale employment site at Junction 27, an additional 260 dwellings are required within Mid Devon over the plan period. As such a total of 7,860 dwellings is preferred.

All other alternatives proposed recommend some form of higher growth scenario. All other higher growth scenarios would result in reduced scoring in the SA. At the intermediate higher growth level there is likely to be a lower score on objective I) delivering the necessary infrastructure. At the higher and elevated growth levels greater negative impacts are felt on objectives: A) natural environment, D) safeguarding and minimising resource use as well as I) delivering the necessary infrastructure. Furthermore arguments provided in representations for the higher growth scenarios are based on the opinion that the higher figures proposed are the accurate OAN, this is not agreed. 7,600 is the objectively assessed need as demonstrated by the updated SHMA evidence. The housing implications of the development of a strategic scale employment site at junction 27 on the M5 motorway has been considered in the August 2016 'Mid Devon Scenarios Policy-on' report of which the results suggest a need of an additional 260 dwellings within Mid Devon District Council over the plan period. All other higher growth scenarios are not supported by evidence, or considered beneficial and therefore are not preferred.

### Distribution of development

None of the proposed alternatives are favoured. The rural distribution alternative would lead to greater negative impacts on almost all sustainability appraisal objectives, would result in unsustainable travel patterns and would be contrary to NPPF advice (para 30). Other alternatives consider scenarios which provide a greater focus in Crediton. One option results in a Crediton and Tiverton focussed scenario.

Implicit in this scenario is the strategic growth to the east of Tiverton in addition to the Tiverton Eastern Urban Extension along with additional growth in rural areas. This alternative would result in a greater negative impact on the objectives: A) natural environment, B) built and historic environment and E) promoting economic growth and employment. It is therefore considered that the alternatives proposed would be less sustainable options and therefore not preferred.

Amount of development (commercial)

Alternative 10 is proposed as a modification to the plan. The option has a number of positive benefits including promoting economic growth and employment, supporting retail and providing the necessary infrastructure which could benefit the wider community.

New information

Alternative 11 represents the new information that has resulted in the consideration of alternative 2 in which a 7,600 dwelling target is considered as the objectively assessed housing need as explained above. Alternative 12 represents the new information that has resulted in the consideration of alternative 3 and the preferred option.

Sustainability appraisal comments

None of the comments are agreed therefore no changes to the SA scores are proposed.

**Summary Matrix - S2 'Amount of Development' Housing**

	Alternative	Preferred	Alternative		
Sustainability Objective	Lower growth scenario (7,200 dwg)	Meet housing need + J27 (7,860 dwg)	Intermediate Higher Growth Scenario (8,000 dwg)	Higher Growth Scenario (8,400 dwg)	Elevated Higher Growth Scenario (8,800 dwg)
A	0	0	0	-1	-2
B	0	0	0	0	0
C	0	0	0	0	0
D	-2	-2	-2	-3	-3
E	+1	+1	+1	+1	+1
F	+1	+1	+1	+1	+1
G	+2	+3	+3	+3	+3
H	+1	+1	+1	+1	+1
I	0	0	-1	-2/?	-2/?

**Summary Matrix - S2 'Distribution of Development'**

	Preferred	Alternative			
Sustainability Objective	New Community (J28 Cullompton)	Tiverton and Crediton Focussed	Rural Distribution	Town Focus (Hartnoll Farm)	New Community (J27 Willand)
A	-1	-2	-2	-1	-2/?
B	0/?	-2/?	-2	-2/?	0/?
C	0/?	0/?	-1/?	0/?	0/?
D	-3	-3	-2	-3	-3/?
E	+3	+2	+2	+2	+3
F	+1/?	+2	+1	+2	-3/?
G	+3	+3	+3	+3	+3
H	0	+1	-2	+1	0
I	+2	+2	-2/?	+2	+2/?

**Summary Matrix - S2 'Amount of Development' - Commercial**

	Preferred	Alternative	
Sustainability Objective	Higher growth scenario incl J27 215,000sqm	Meet commercial need 154,000sqm	Higher growth scenario 310,000sqm
A	-1	0	-1
B	0/?	0	0
C	-1/?	0	-1
D	-2	-1	-3
E	+3	+3	+3
F	+3	+3	+2
G	0	0	0
H	+2	+2	0
I	+2/?	0	-2



### S3 Meeting housing needs

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<p>1. 35% affordable housing target. A representation was made during the Local Plan Review Proposed Submission consultation and noted that <i>'the affordable housing target should be 35% reflecting need'</i>.</p>	<p>This alternative would help provide the supply of affordable housing sooner and therefore has a positive effect on providing housing however the score for objective G) meeting housing needs remains the same as +3 is the maximum score provided. This alternative would however result in a greater negative effect on objective I) delivering the necessary infrastructure in comparison to the preferred policy given that no CIL could be levied within the lowest land valued areas. Although there is potential this could be levied in the upper end sales values in towns and rural areas. Some of the key infrastructure in the towns set out in the Mid Devon Infrastructure Plan which are not set out in the proposed strategic allocations (which are to be provided via S106 rather than CIL) would not be provided as part of CIL. Overall the difference in score in comparison to the preferred alternative is a - 1 score for objective I) delivering the necessary infrastructure.</p>
<p>2. Remove the requirement to provide 5% of serviced dwellings. A representation was made during the Local Plan Review Proposed Submission consultation and noted that <i>'there is no quantified need for self build. It is unclear that selfbuilders will wish to purchase plots on larger housing estates. There are practical challenges eg times of working associated with selfbuilders on a larger housing site. The requirement to provide 5% should be removed.'</i></p>	<p>The alternative of not requiring 5% of serviced dwelling plots for self-buildings would reduce the SA score for meeting housing needs to a negative effect given that it would be unlikely that service plots would be provided if this requirement was not within the policy. Therefore there would be less housing mix and consequently a reduced SA score is considered. This is however identified as uncertain as the alternative suggests only removing part of criterion d) and therefore the inclusion of the rest of the criterion may lead to some serviced</p>

	plots for self-building. Overall the difference in score in comparison to the preferred alternative is a +2/? score for objective G) meeting housing needs.
<b>Distribution of gypsy and traveller pitches</b>	
<p>3. Town focussed urban extensions</p> <p>A representation was made during the Local Plan Review Proposed Submission consultation which <i>'Gypsy and Traveller Accommodation Assessment does not justify allocations on particular sites'</i>.</p> <p>In response to this representation alternatives for the general distribution of development have been considered. A town focussed urban extension approach is assessed here and a rural distribution new sites approach in defined villages is set out below. Summary matrices are provided below with full assessments in annex 3.</p>	<p>This is the preferred option in the Local Plan Review. The option scores a neutral or positive score for all sustainability objectives with the exception of objective D) safeguarding and minimising resource use which scores a slight negative score. In comparison to the rural distribution alternative for traveller pitches the town focussed approach scores more positively and therefore is preferred.</p>
<p>4. Rural distribution new sites in defined villages.</p> <p>A representation was made during the Local Plan Review Proposed Submission consultation which <i>'Gypsy and Traveller Accommodation Assessment does not justify allocations on particular sites'</i>.</p> <p>In response to this representation alternatives for the general distribution of development have been considered. A rural distribution of new sites approach in defined villages is assessed here and a town focussed urban extensions approach is set out above. Summary matrices are provided below with full</p>	<p>In comparison to the preferred town focussed urban extensions approach this option scores more negatively on the sustainability objectives and therefore is not preferred.</p>

assessments in annex 3.	
<b>New Information</b>	
<p>5. New information was made available during the consultation on the Local Plan Review Proposed Submission. Upon review, it is proposed to increase the objectively assessed housing need to 380 per year to reflect the advice in the SHMA resulting in an OAN of 7600 dwellings. In addition, 260 dwellings is proposed in response to the policy-on scenario of including the option of a strategic scale employment site at junction 27 on the M5 motorway resulting in a total of 7860 dwellings.</p>	<p>This alternative would result in a change to S2 (please see comments in S2 for full details) with a change in the total and annual number of dwellings referenced in S3. No change is proposed to the SA in response to this change.</p>
<b>Changes to the Plan</b>	
<p>Alternative 3 is the preferred approach currently promoted by the Local Plan Review therefore no change is required.  Alternative 5 is suggested as a modification to the plan which would result in a 7,860 dwelling target (reasons are provided in S2), this would result in no change to the SA of S3.  All other alternatives are not considered beneficial and therefore are not preferred.</p>	

**Summary Matrix – S3 Meeting Housing Needs**

	Preferred	Alternative	
Sustainability Objective	Proposed Submission Policy	35% affordable housing target	Remove 5% serviced plots self-build
A	0	0	0
B	0	0	0
C	0	0	0
D	0	0	0
E	0	0	0
F	0	0	0
G	+3	+3	+2/?
H	+1	+1	+1
I	0	-1	0

**Summary Matrix – S3 Meeting Housing Needs - Gypsy site alternatives**

	Preferred	Alternative
Sustainability Objective	Town focussed urban extensions	Rural focussed new sites in defined villages
A	0	-1/?
B	+1	-2/?
C	0	-2
D	-1	-2
E	0	0
F	0	0
G	+3	+3
H	+2	-1
I	0	0

**S4 Ensuring housing delivery**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<p>1. Delete the policy.</p> <p>A representation was made during the Local Plan Review Proposed Submission consultation and noted that <i>'the contingency sites should be allocated to meet housing need, and</i></p>	<p>The deletion of this policy would lead to a weakened plan in which there would be no strategic policy to ensure housing delivery. This policy enables action if expected delivery falls significantly below the annual target set out in policy S3. Overall without this policy it would</p>

<i>therefore this policy is unnecessary and should be deleted.'</i>	result in a less flexible and sustainable plan as it suggests a higher growth scenario with no flexibility. The impact of higher growth scenarios are discussed under S2.
<b>New Information</b>	
2. New information was made available during the consultation on the Local Plan Review Proposed Submission. Upon review, it is proposed to increase the objectively assessed housing need to 380 per year to reflect the advice in the SHMA. In addition, 260 dwellings is proposed in response to the policy-on scenario of including the option of a strategic scale employment site at junction 27 on the M5 motorway resulting in a total of 7860 dwellings.	This alternative would result in a change to S2 (please see comments in S2 for full details) with a change in reference in S4 including the defined action levels. It would not result in a change in the SA score for S4 as the mechanism to ensure housing delivery would remain the same.
<b>Changes to the Plan</b>	
<p>Alternative 2 is suggested as a modification to the plan which would result in a 7,860 dwelling target (reasons provided in S2). This would result in amendments in S4 which have reference to the overall dwelling target, including the table which sets out the defined action levels however this would result in no change to the SA score as the mechanism to ensure housing delivery would remain the same.</p> <p>Alternative 1 suggests the deletion of the policy with the justification based on allocating contingency sites and therefore the policy is unnecessary. The justification for the alternative is not agreed and the alternative is not preferred. The deletion of the policy would lead to a weakened plan in which there would be no strategic policy to ensure housing delivery.</p>	

**Summary Matrix - S4 Ensuring Housing Delivery**

No additional appraisals for S4 have been undertaken. Where changes proposed would result in an alternative to S2 these have been considered under the S2 section of this annex. One alternative suggests the deletion of the policy entirely which would result in no appraisal for S4 but would affect the sustainability of the plan as a whole given that there would be no planning policy to ensure housing delivery.

## S5 Public open space

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<p>1. Sustainable Urban Drainage Systems (SUDs) to be considered as public open space.</p> <p>A representation was made during the Local Plan Review Proposed Submission consultation and stated that they <i>'Disagree with paragraph 2.35, SUDs provision should be considered as public open space.'</i></p>	<p>This alternative would result in a reduced SA score for objective H) Community health and wellbeing. In which a +2/? Is considered instead of +3. In considering SUDs as public open space, this could to lead to less open space available/suitable for recreational use as some types of SUDs are inaccessible for public use. However if the rest of the policy were to remain the same then it would still be considered that the policy overall would have a positive effect on this objective. An uncertain effect is considered as some SUDs schemes that are particularly well-designed could be counted against open space provision however this would be decided case-by-case. Furthermore it would be uncertain how much land would be required for SUDs as this is dependent on each scheme and therefore the impact on the overall open space provision is uncertain. The scores for the other objectives are considered to remain the same.</p>
<p>2. The provision of open space should be applied to the towns of Tiverton, Cullompton and Crediton and not parishes.</p> <p>A representation was made during the Local Plan Review Proposed Submission consultation asked <i>'Should third word of first line be 'towns' as opposed to 'parishes'?''</i></p>	<p>This alternative would result in a reduced SA score for objective H) Community health and wellbeing. In which a +2 would be considered instead of a +3. This is because the whole needs of the district would not be covered by the policy but would only provide for the towns rather than include the parishes in which they fall within. All other SA scores are considered to remain the same.</p>
<p><b>Changes to the Plan</b></p>	

In response to alternative 2 a change in wording is proposed to clarify that the policy refers to the parish boundaries of the settlements noted reflecting the original intention of the policy.

All other alternatives are not beneficial and therefore are not preferred.

**Summary Matrix - S5 Public open space**

	Preferred	Alternative	
Sustainability Objective	Proposed Submission Policy	SuDs considered as public open space	Open space in towns not parishes
A	+2	+2	+2
B	+2	+2	+2
C	0	0	0
D	0	0	0
E	0	0	0
F	0	0	0
G	-1	-1	-1
H	+3	+2/?	+2
I	+2	+2	+2

**S6 Employment**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
1. Employment allocations small scale in rural locations. A representation was made during the Local Plan Review	Policy S6 sets out a target for the amount of commercial floorspace but does not detail the location. This alternative would not have an



<p>Proposed Submission consultation and noted that <i>'The allocations are in the wrong place (Cullompton especially) and therefore are unlikely to achieve these targets; there should be more small scale rural provision which would be easier to develop. This concern is supported by the lack of employment development in recent years.'</i></p>	<p>impact on the SA score for this policy as the representation suggests alternative commercial allocations rather than result in a change to this policy. All sites currently proposed for allocation have been considered by a panel of experts and are considered deliverable. Alternative 6 for policy S2 which looks at a rural distribution of development gives some indication of the impact on the sustainability appraisal when distributing employment development more widely. The rural distribution alternative would lead to greater negative impacts on almost all sustainability appraisal objectives in comparison to the preferred alternative for S2 and would result in unsustainable travel patterns and would be contrary to NPPF advice in para 30.</p>
<p>2. Major leisure and tourism should be allocated. A representation was made during the Local Plan Review Proposed Submission consultation which promoted the option for a major leisure and tourism allocation on a site at junction 27 of the M5.</p>	<p>Policy S6 sets out a target for the amount of commercial floorspace but does not detail the specific allocations within the policy wording. This alternative would not have an impact on the SA score for this policy as the representation suggest an alternative commercial allocation rather than result in a change to this policy. The commercial allocation of junction 27 is considered later in this annex under the allocations section.</p>
<p><b>Changes to the Plan</b></p>	
<p>The alternatives suggested do not result in changes to policy S6 as such no changes are proposed.</p>	

**Summary Matrix - S6 Employment**

No additional appraisals for S6 have been undertaken, the impacts of the proposed reasonable alternatives are limited, in which no significant amendments to the SA are considered.

### **S7 Town centres**

No comments under S7 are considered to give rise to alternatives to be considered in this annex.

### **S8 Infrastructure**

No comments under S8 are considered to give rise to alternatives to be considered in this annex.

### **S9 Environment**

No comments under S9 are considered to give rise to alternatives to be considered in this annex.

### **S10 Tiverton**

No comments under S10 are considered to give rise to alternatives to be considered in this annex.

### **S11 Cullompton**

No comments under S11 are considered to give rise to alternatives to be considered in this annex.

### **S12 Crediton**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<b>New Information</b>	
1. An additional criterion in the policy 'community and education facilities and other infrastructure to support the development proposed'. A representation was made during the Local Plan Review Proposed Submission consultation by Devon County Council and	This would result in an improved SA score of +2/? for h) ensuring community health and wellbeing, given that the school would not only provide for the new development proposed in Crediton but would meet the existing shortfall of education capacity in Crediton. The uncertain impact remains based on the existing comments in the

<p>noted that <i>'There is a need for a new 1.1 ha primary school site.'</i>  The need for a new primary school was only identified at the Proposed Submission consultation stage of the Local Plan and therefore is new information that has been considered.</p>	<p>SA with regard to the effect of development on local air quality which is not quantified.</p>
<p><b>Changes to the Plan</b></p>	
<p>Alternative 1 is proposed as a modification to the plan. This alternative would result in an improved score for h) ensuring community health and wellbeing by providing a new school which will not only meet the needs of the new development proposed in Crediton but would also meet the existing shortfall.</p>	

**Summary Matrix - S12 Crediton**

	Preferred	Alternative
Sustainability Objective	Criterion on community and education facilities	Proposed Submission Policy
A	-1	-1
B	0	0
C	-1	-1
D	0	0
E	+3	+3
F	+2	+2
G	+3	+3
H	+2/?	0/?
I	+3	+3

## S13 Villages

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<p>1. Edge of Village Development.</p> <p>A representation was made during the Local Plan Review Proposed Submission consultation and noted that the Local Plan <i>'Should identify edge-of-village potential where there is no five year supply and where there is insufficient housing development in accordance with paragraph 2.11.'</i></p> <p>A representation was also made which noted that <i>'Taken with S14 these create a "presumption against development" in rural areas outside settlement boundaries, contrary to the NPPF (see para 55). The policy should allow development adjoining settlement limits.'</i></p> <p>In response to these comments an 'edge of village development' alternative has been considered.</p>	<p>This alternative would result in greater negative impacts in the SA on objectives A) protecting the natural environment, B) protection and promotion of a quality built environment, C) mitigating the effects of climate change, H) ensuring community health and wellbeing and I) delivering the necessary infrastructure. It also leads to an uncertain effect on objective D) safeguarding and minimising resource use. The option could lead to greater cumulative impacts given that development would be allowed beyond settlement limits and therefore would be less contained. An edge of village alternative has been appraised in annex 3 and a summary matrix is provided below.</p>
<p><b>Changes to the Plan</b></p>	
<p>Alternative 1 is not preferred as it would lead to a less sustainable policy. The role of the contingency sites ensure housing delivery without the need for edge-of-village development. The option could lead to greater cumulative impacts given that development would be allowed beyond settlement limits and therefore would be less contained.</p>	

**Summary Matrix - S13 Villages**

	Preferred	Alternative
Sustainability Objective	Proposed Submission Policy	Edge of village development
A	+3	+1
B	0	-1
C	+1	0
D	0	0/?
E	+3	+3
F	+3	+3
G	+3	+3
H	+3	+1
I	+2	+1

**S14 Countryside**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>New Information</b>	
<p>1. Planning Policy for Traveller Sites published in August 2015. National policy requires that new sites for travellers should be very strictly limited in open countryside that is away from existing settlements or outside areas allocated in the development plan. In response to this change in policy the removal of reference of provision of gypsy and traveller accommodation in this policy has</p>	<p>It is considered this change to policy would not significantly impact the SA scoring in which this amendment would be relevant to objective G) meeting housing needs, given that the policy remains supportive of affordable housing to meet local needs no change to the SA scoring is proposed. The need for gypsy and traveller sites as discussed in S3 have been allocated within larger sites and the</p>

been considered.	opportunity for the provision of gypsy and traveller accommodation remains positive in DM7.
<b>Changes to the Plan</b>	
Alternative 1 is preferred to ensure the Plan is in conformity with national policy.	

**Summary Matrix - S14 Countryside**

The alternative proposed for this policy is not considered to give rise to any impact on the SA scoring.

## Site Allocations

### Tiverton

#### TIV1 – TIV5 Eastern Urban Extension

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<p>1. Allocation for 1730 dwellings.</p> <p>A representation was made during the Local Plan Review Proposed Submission consultation and noted that <i>'Area B within the EUE is yet to be masterplanned, but survey work indicates that up to 799 dwellings can be accommodated on it, compared with the 553 dwellings referred to within the Local Plan. Together with slightly higher yields from the applications in Area A the total capacity of the site should be up to 1829 dwellings, rather than the 1520 dwellings indicated. This will improve viability and the efficient use of land for development. The policy should be amended to give a range of housing provision.'</i></p> <p>An alternative of providing a range of 1580-1830 dwellings is considered. This takes into account permissions granted on area A and the potential for increased density in area B.</p>	<p>The alternative would not change the SA scores given that proposed area of the allocation and other criteria in the policy remain to provide mitigation to the potential negative effects of the development. The potential to increase the number of dwellings is still within the transport constraints of the area.</p>
<b>New Information</b>	
<p>2. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies the canal to the south of the site is a conservation area</p>	<p>The additional items to be mentioned in the SA would not affect the scoring as the SA already takes into account a conservation area impact and the presence of locally listed heritage assets on site would not change the score as other heritage assets such as listed buildings and scheduled ancient monuments have already been recognised in</p>

which was not previously picked up in the SA commentary although the Blundell's conservation area was mentioned. The HEA also goes into greater detail and identifies locally listed heritage assets on site which was not picked up in the SA.	the score. TIV1-TIV5 provides the mitigation measures as recommended in the HEA and therefore no change to the post-mitigation score is suggested.
<b>Changes to the Plan</b>	
Alternative 1 is proposed as an amendment to plan.	

**Summary Matrix – TIV1-6 Eastern Urban Extension**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**TIV6 Farleigh Meadows**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<b>New Information</b>	
1. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies that there are two listed buildings some distance from the site, Exe View (Grade II) is located to the south and there is another listed building located to the south west which was not previously picked up in the SA. The HEA also takes an entry from Devon County Council's comment on the outline planning application for this site in which it recognises potential archaeological resource in the area and suggests a non-intrusive	The HEA notes that there would not be any anticipated heritage impact and therefore there would be no change to the scoring in the SA with regard to heritage. In considering archaeological investigation, given that conditions regarding archaeological investigation have been discharged no mitigation is recommended and the SA scoring will remain the same.



field investigation. Reserved matters permission has been subsequently granted and pre-commencement conditions regarding archaeological investigation have been discharged. The site is now under construction.	
<b>Changes to the Plan</b>	
No changes are proposed to the Plan.	

**Summary Matrix - TIV6**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**TIV7 Town Hall / St Andrew Street**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<b>New Information</b>	
1. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The SA already identifies listed buildings adjoining the site however the HEA goes into further detail and notes that the allocation includes works to two listed buildings and potential demolition of some unlisted buildings in the conservation area. The SA previously did not note the location of the site within the Tiverton Conservation Area. The DCC archaeology team commented on the application for the site and stated that they did not consider the site to be of	The information provided in the HEA would result in a pre-mitigation score from -1 to -2 on objective B given that the Tiverton Conservation Area was not previously mentioned. The post-mitigation score would remain as 0 taking into account the positive impact of bringing back into use the two listed buildings but development to the rear of the site potentially changing the character and appearance of the conservation area and the development pattern of the historic town. The scale, design and massing of the scheme was considered acceptable by the planning committee. With regard to archaeological investigation, given the comments provided by the DCC archaeology team no mitigation is recommended and the SA scoring will remain

significant archaeological value and did not need any further mitigation.	the same.
<b>Changes to the Plan</b>	
No changes are proposed to the plan, the new information provided by the HEA does not overall change the post-mitigation score and a full planning application has been approved.	

**Summary Matrix –TIV7**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**TIV8 Moorhayes Park**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<b>New Information</b>	
1. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies that there is an ancient monument located to the north west (on the north side of the A361) and the Knightshayes Historic Park is located to the north which was not previously picked up in the SA.	The SA previously did not identify these two heritage elements; however the HEA does state that the development would have no anticipated heritage impact and therefore would not change the score of the SA.
<b>Changes to the Plan</b>	
No changes to the Plan are proposed.	

### **Summary Matrix – TIV8**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

### **TIV9 Howden Court**

No comments under TIV9 are considered to give rise to alternatives to be considered in this annex.

### **TIV10 Roundhill**

No comments under TIV10 are considered to give rise to alternatives to be considered in this annex.

### **TIV11 Palmerston Park**

No comments under TIV11 are considered to give rise to alternatives to be considered in this annex.

### **TIV12 Phoenix Lane**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
1. Delete policy TIV12 Phoenix Lane. A representation was made during the Local Plan Review Proposed Submission consultation and noted that ' <i>Policy TIV12 should be deleted.</i> '	The deletion of this policy would lead to a less positive and sustainable plan in which there would be no allocation proposing the regeneration of Tiverton town centre.
<b>Changes to the Plan</b>	
The proposed alternative is not preferred as they would lead to a less positive and sustainable plan. The justification for deletion is also not agreed.	

### **Summary Matrix - TIV12**

One alternative suggests the deletion of the policy entirely which would result in no appraisal for TIV12 but would affect the sustainability of the plan as a whole. The deletion of this policy would lead to a less positive and sustainable plan.

### **TIV13 Tidcombe Hall**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<p>1. Delete policy TIV13 Tidcombe Hall. A representation was made during the Local Plan Review Proposed Submission consultation and noted <i>'Objection as Tidcombe Lane is good boundary for development south of the canal and sufficient housing being built in Tiverton and more promised in future.'</i></p>	<p>This comment suggests the deletion of Tidcombe Hall contingency site. This would lead to the loss of the contingency site and a less sustainable and flexible plan in terms of meeting housing needs. The purpose of the contingency sites is explained in policy S4.</p>
<p>2. 8.4ha with 200 dwellings This alternative re-considers the allocation as set out in the options consultation for a higher number of dwellings taking into account the information set out in the Historic Environment Appraisal (HEA) and reasons for the reduction in total dwellings based on SHLAA panel recommendations. Note the site area for the preferred alternative noted in the Proposed submission policy and this alternative are the same. 5.0ha noted in the Proposed Submission policy was written in error.</p>	<p>In reconsidering this site for the higher number of dwellings presented during the Local Plan Review Options consultation given the reasons for the reduction in total dwellings based on SHLAA panel and HEA recommendations, the site scores more negatively than the preferred policy in objectives A), B) and I) predominately due to the greater scale of development proposed within the allocation and the limitations of mitigation options as reflected in the latest evidence. A full appraisal is provided in annex 3 and a summary matrix is provided below.</p>
<b>New Information</b>	
<p>3. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic</p>	<p>This would result in no change to the pre or post mitigation SA scores of the Proposed Submission Local Plan Review as the importance of</p>

<p>environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies the same elements as mentioned in the SA in objective B, but goes further to note that Tidcombe Hall is a 'potential heritage asset'.</p>	<p>Tidcombe Hall was already recognised in policy. Mitigation is also reflected in the reduced housing number in comparison to the higher density presented at the Local Plan Review Options consultation and discussed above.</p>
<p><b>Changes to the Plan</b></p>	
<p>Alternative 1 suggests the deletion of the policy entirely with the justification based on the argument that Tidcombe Lane is a good boundary for development and there is sufficient housing in Tiverton. The purpose of the contingency site is to enable flexibility in the plan to enable further sites to come forwards if the expected level of delivery falls significantly below the annual target. Overall the plan would be less sustainable without this contingency site as there would be less flexibility to ensure housing needs are met. Alternative 1 is therefore not preferred. Alternative 2 would result in greater negative impacts on the sustainability objectives A) natural environment, B) built and historic environment and I) delivering the necessary infrastructure and is therefore not preferred. New information presented in the Historic Environment Appraisal would not change the pre or post mitigation scores for the proposed submission policy which already recognises the elements set out in the HEA.</p>	

**Summary Matrix - TIV13 Tidcombe Hall**

	Preferred	Alternative
Sustainability Objective	Proposed Submission Policy	8.4ha 200 dwellings
A	-1	-2
B	-1/?	-2/?
C	0/?	0/?
D	-3	-3
E	+1	+1
F	+2	+2
G	+3	+3
H	0	0
I	0	-2

**TIV14 Wynnards Mead**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<p>1. Delete policy TIV14 Wynnards Mead.</p> <p>A representation was made during the Local Plan Review Proposed Submission consultation and noted that they '<i>Object as housing not needed/already over-provision within the plan/sufficient building going on elsewhere.</i>'</p>	<p>This comment suggests the deletion of Wynnards Mead contingency site. This would lead to the loss of the contingency site and a less sustainable and flexible plan overall in terms of meeting housing needs. The purpose of the contingency sites is explained in policy S4.</p>
<b>New Information</b>	
<p>2. A representation was made during the Local Plan Review</p>	<p>The existing appraisal for TIV14 has been updated to assess the</p>

<p>Proposed Submission consultation and noted that <i>'Policy currently unsound, advises reference to Cottey Brook be given, and requests unobstructed public open space buffer, at least 7m wide to allow for future maintenance of watercourse.'</i></p> <p>In response to this new information two alternatives are considered. The first considers the proposed contingency allocation in light of this new information without additional mitigation. The second considers a reduced area alternative as a result of additional mitigation to respond to this new information.</p>	<p>impact of this new information. If only the existing mitigation proposed in the Local Plan Review proposed submission policy is provided a reduced score for objective C) mitigating the effects of climate change is considered as the flood risk set out in the Environment Agency representation wouldn't have been accounted for. To provide the necessary mitigation required in response to new information provided by the Environment Agency and the Historic Environment Appraisal (discussed below) a new reduced area alternative is proposed. Full appraisals of the original site area taking into account the impact of this new information with existing mitigation and a reduced area site alternative are provided in annex 3 with a summary matrix provided below.</p>
<p>3. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies that Gotham since the previous appraisal has been upgraded to a grade II* listing. The HEA finds development as proposed would be very damaging to the setting of the listed building and heritage asset Wynnards Mead and would erode their special interest.</p> <p>In response to this new information two alternatives are considered. The first considers the proposed contingency allocation in light of this new information without additional mitigation. The second considers a reduced area alternative as a</p>	<p>The existing appraisal for TIV14 has been updated to assess the impact of the new information provided by this alternative with the existing mitigation in the policy. As a result of this new information regarding the historic environment appraisal a significant negative impact is considered for objective B) protection and promotion of a quality built and historic environment. To provide the necessary mitigation required in response to new information provided by the Environment Agency (discussed above) and the Historic Environment Appraisal a new reduced area alternative is proposed. Full appraisals of the original site area taking into account the impact of this new information with existing mitigation and a reduced area site are provided in annex 3 with a summary matrix provided below.</p>

result of additional mitigation to respond to this new information.	
<b>Sustainability Appraisal Comments</b>	
<p>4. A representation was made during the Local Plan Review Proposed Submission consultation and noted that they <i>'Object to score for objective B) protection and promotion of a quality built and historic environment. Argues score is too high and does not take into account the other heritage assets.'</i></p> <p>Individual (5551)</p>	<p>The site has been reassessed due to new evidence undertaken as part of the Historic Environment Appraisal (HEA). Gotham since the previous appraisal has been upgraded to a grade II* listing. The HEA finds development as proposed would be very damaging to the setting of the listed building and heritage asset Wynnards Mead and would erode their special interest. In response to this new information provided in the HEA a significant negative effect -3 on objective B) built and historic environment is considered in the reappraised SA. The impact of the new information with existing mitigation and an alternative of a reduced area have been appraised and a summary matrix is provided below.</p>
<p>5. A representation was made during the Local Plan Review Proposed Submission consultation and noted that they <i>'Object to score for objective D) safeguarding and minimising resource use. Argues score is too high due to agricultural nature of the land with 1/3 of land classified as Grade 3 and contaminated land.'</i></p> <p>Individual (5551)</p>	<p>The appraisal guidance p.192 of the Proposed Submission SA sets out how agricultural grades and land contamination have been considered as part of the appraisal process. The elements noted in the representation have been considered consistent with other sites in the Local Plan Review. Therefore the suggested change is not agreed.</p>
<p>6. A representation was made during the Local Plan Review Proposed Submission consultation and noted that they <i>'Object to score for objective E) promoting economic growth and employment. Boosting local construction firms and associated trades is true of all development and should not be the test but whether the finished development promotes growth/employment.'</i></p> <p>Individual (5551)</p>	<p>Agree the scoring should be reduced to 0 as the score provided for this site in the previous SA does not follow the appraisal guidance on p.192 in which residential development less than 100 dwellings is considered to have a neutral effect. This scoring has been consistently applied to other sites in the Local Plan Review. Disagree that boosting local construction firms and associated trades should not be</p>



	considered in this objective. For larger sites residential development is considered to have a slight positive impact. This agreed scoring has been reflected in the updated and reduced area alternative appraisals and a summary matrix is provided below.
<p>7. A representation was made during the Local Plan Review Proposed Submission consultation and noted that they <i>'Object to score for objective F) supporting retail. Believe should only consider new retail provision.'</i></p> <p>Individual (5551)</p>	Consistent with other sites appraised in the Local Plan Review, where small sites are proposed within a town a slight positive effect on the town centre is considered. Disagree that the impact on existing retail should not be considered as part of this objective. As set out in the SA, this objective considers safeguarding the vitality and viability of town centres and the relationship between new development and town centres. No change to the SA is proposed.
<p>8. A representation was made during the Local Plan Review Proposed Submission consultation and noted that they <i>'Object to score for objective G) meeting housing needs. A significant positive effect overstates the number of houses the site is actually providing in the context of the Plan as a whole.'</i></p> <p>Individual (5551)</p>	Agree that the term 'significantly' is misleading and is therefore suggested to be removed from the commentary. However disagree that the score is too high. Consistent with other sites appraised in the Local Plan Review sites of a scale of 20-99 dwellings are considered to have a positive impact in meeting housing needs. No change to the SA is proposed.
<p>9. A representation was made during the Local Plan Review Proposed Submission consultation and noted that they <i>'Object to score for objective H) ensuring community health and wellbeing. Disagree site is close to a bus service and suggests that there's no other evidence for this score.'</i></p> <p>Individual (5551)</p>	Disagree, there are a number of bus services available within 0.5 miles of the site. The site is also within walking distance to Tiverton Town centre. Consistent with other sites appraised in the Local Plan Review this site has scored a slight positive impact for the reasons above. No change to the SA is proposed.
<b>Changes to the Plan</b>	
Alternative 1, the deletion of the policy is suggested as a modification to the plan, although not for the reasons provided in the comment but in	

response to the new information provided by alternative 2 and 3. Whereby in considering the new information presented by the EA on flood risk and the built and historic environment by the HEA, to continue with the existing policy would lead to a significant negative effect on objective B) protection and promotion of a quality built and historic environment, and a negative effect on objective C) mitigating the effects of climate change. Due to this new information, the policy as proposed is no longer preferred.

A reduced area alternative was considered by this SA in response to the mitigation required by the new information which would result in a site of 1.2ha subject to 29 dwellings. This alternative would result in an improved score for B), C) and D). However overall given that the purpose of the site for inclusion as a contingency allocation, the reduced area alternative would no longer support the quantum of development required to be effective as a contingency allocation. The site is therefore proposed for deletion. The deletion of the policy results in the loss of the contingency site and therefore a less sustainable and flexible plan, however the sustainability issues of the site outweigh the benefit of the inclusion of the contingency site without mitigation. Flexibility in the plan overall continues as two other contingency sites in the plan remain.

Comment 6 is suggested as a modification to the SA objective E) promoting economic growth and employment, as the original score did not follow the appraisal guidance on p.192 in which small scale residential development which is less than 100 dwellings is considered to have a neutral effect. This has been reflected in the reappraised sites, taking into account the impact of new information with existing mitigation and the reduced area alternative. All other alternatives refer to SA scoring and are not preferred for reasons set out above. The impact of the new information with existing mitigation and an alternative of a reduced area have been appraised. A summary matrix is provided below along with the scoring for the original appraisal for comparison.

**Summary Matrix - TIV14 Wynnards Mead**

Sustainability Objective	Alternative		
	Previous SA (no new info)	Updated SA (new info, existing mitigation)	Reduced Area
A	-1	-1	-1
B	0	-3	0
C	0	-2	0
D	-1/?	-1/?	-1/?
E	+1	0	0
F	+1	+1	+1
G	+2	+2	+2
H	+1	+1	+1
I	0	0	0

**TIV15 Tiverton Infrastructure**

No comments under TIV15 are considered to give rise to alternatives to be considered in this annex.

## Tiverton Alternative Options

### OTIV2 Hartnoll Farm

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<p>1. Hartnoll Farm with 1000 dwellings and 20,000sqm employment. A representation was made during the Local Plan Review Proposed Submission consultation and noted that they '<i>Object to exclusion– site can accommodate 1000 dwellings (at 35 per hectare, with full mix of types and sizes, and an element of affordable housing), at least 20,000sqm employment (6.97ha allowed to wrap around existing Hartnoll Business Centre), primary school (1.95ha allowed), neighbourhood/local centre (to serve retail/social needs of community inc. 2000sqm mix of uses including community hall/space, local shops, restaurant/café, pub and/or hot food takeaway) and green infrastructure (12.07ha inc amenity open space, children’s play, allotments/orchards, buffer planting, sports/playing field provision off-site on adjacent land to south). Site can accommodate not only 500 dwellings currently allocated towards EUE area B, but more of Tiverton’s future demand.</i>'</p> <p>In response to this, an alternative of OTIV2 was considered with a change in total number of dwellings to 1000 and an addition of 20,000sqm employment. The other suggestions in the representation are already covered by the existing criterion in the Local Plan Review options policy which was consulted in 2014.</p>	<p>The change in this policy would result in a change in score for objective E) promoting economic growth and employment in which the policy provides 20,000 sqm of commercial floorspace helping to diversify the economy and encourage inward investment. Development of this scale would be a boost to local construction firms and associated trades who would benefit from being able to undertake contract work on the site. It provides employment sites near where to people live would provide the opportunity to reduce out-commuting. There would therefore overall be a significant positive impact +3 in objective E) promoting economic growth and employment. All other scores for the objectives in the SA are considered to remain the same.</p>

**Changes to the Plan**

Alternative 1 is not preferred and OTIV2 Hartnoll Farm is not proposed as an allocation given the issues around objective B) Protection and promotion of a quality built and historic environment in which the coalescence of Tiverton and the village of Halberton which has its own separate identity cannot be mitigated.

**Summary Matrix - OTIV2**

	Alternative	
Sustainability Objective	Local Plan Review Options Policy	1000 dwellings, 20,000sqm employment
A	-1	-1
B	-2/?	-2/?
C	0/?	0/?
D	-3	-3
E	+2	+3
F	+2	+2
G	+3	+3
H	+1	+1
I	+2	+2

**OTIV4 Blundells School (Proposed for allocation TIV16)**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>Sustainability Appraisal Comments</b>	
<p>1. National planning policy acknowledges the importance of ensuring housing numbers and employment opportunities are considered in tandem. In response to this full Council on 22<sup>nd</sup> September 2016 resolved to reallocate land at Blundells School for residential development of 200 dwellings. The policy has been amended to reflect the latest evidence and has been reappraised taking these findings into account. A full appraisal has been provided in Annex 3 and a summary matrix is provided below.</p>	<p>In comparison to the alternative considered during the Local Plan Review Proposed Submission (2015) at Blundells School for 60 dwellings, this alternative scores more positively or the same in all aspects apart from objective e) promotion of economic growth and employment given the 7000sqm of commercial floorspace is no longer considered. This new appraisal takes into account new information including the support of the Environment Agency and the provision of a new junction on Heathcoat way to enable the delivery of 200 dwellings. The appraisal also has greater recognition of the benefits of the contamination assessment and remediation of the site.</p>
<b>New information</b>	
<p>2. The Environment Agency has provided its support for the Blundells School site given that the development of the site would provide an opportunity to promote green infrastructure, contribute towards Water Framework Directive objectives through the policy area specifically the Industrial Estate, reduce flood risk downstream within Tiverton and alleviate erosion issues opposite Tiverton Business Park.</p>	<p>This new information has improved the scores for objective C) mitigating the effects of climate change.</p>
<p>3. Provision of junction on Heathcoat Way.</p>	<p>This new information enables the delivery of 200 dwellings on the site as such improvements are considered for a number of the objectives including objective G) Meeting housing needs.</p>

<p>4. Development is now considered deliverable. The costs principally associated with access and flood mitigation measures at the Proposed Submission stage of the Local Plan was considered to prohibit development in this location. However these issues have now been overcome.</p>	<p>This new information does not change the scoring of the site. The site is now proposed for allocation.</p>
<p>5. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies that there will be some impact on the Conservation area however notes that good design can provide scope for improvement of the setting of the conservation area.</p>	<p>This new information is recognised in the Sustainability Appraisal and post-mitigation a slight positive score is considered overall.</p>
<p><b>Changes to the Plan</b></p>	
<p>The policy is proposed to be included as part of the Local Plan Review. Overall the policy scores more positively than the option considered at the Local Plan Review Proposed Submission consultation (2015).</p>	

### Summary Matrix OTIV4

	Preferred	Alternative
Sustainability Objective	Blundells School 200 dwellings (proposed modifications)	Blundells School 60 dwellings
A	+2	+2
B	+1/?	0/?
C	+2	-1
D	+2	-1
E	-1	+2
F	+2	+2
G	+3	+2
H	+2	+1
I	+1	+1

### OTIV13 Exeter Hill

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>Sustainability Appraisal Comments</b>	
1. A representation was made during the Local Plan Review Proposed Submission consultation and noted that they ' <i>Object to exclusion – SA highlighted landscape impacts, but not a valued/designated landscape as per NPPF, and impact</i>	It is agreed that the scoring for objective A) protection of the natural environment should be amended to a -1 rather than a -2 score to be aligned with other sites in which existing development forms a backdrop but the site is highly visible. This concurs with the Inspectors



<p><i>exaggerated/landscape impact not substantiated by evidence, will be seen against backdrop of town, and can be assimilated with careful design and strategic planting’.</i></p> <p>N Jillings for Devonshire Homes (1050); Dial Holdings c/o PCL Planning (2315)</p>	<p>comment during the Examination of the AIDPD. He concluded in consideration of visual impact it would be a relatively modest extension to the urban area, set below the skyline, but nevertheless it would be more intrusive than other allocations.</p>
<p><b>Changes to the Plan</b></p>	
<p>No changes are proposed to the Local Plan given that the site is not required for development to meet the needs of the Local Plan and it would be more intrusive than other allocations.</p>	

**Summary Matrix – OTIV13**

	Alternative	
Sustainability Objective	Local Plan Review Options Policy	SA amendment objective A
A	-2	-1
B	0/?	0/?
C	0	0
D	-1/?	-1/?
E	0	0
F	+1	+1
G	+2	+2
H	0	0
I	0	0

**OTIVNEW New Site Land at Seven Crosses Hill**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<p>1. OTIVNEW Land at Seven Crosses Hill, 7.69ha for 184 dwellings.</p> <p>A representation was made during the Local Plan Review Proposed Submission consultation which put forward a site of <i>'7.69ha; provides logical sustainable expansion of Tiverton, in light of uncertainty with EUE masterplanning. Site enclosed by established boundary planting, with scope to reinforce boundary trees/hedges to maintain 'soft' green edge to this part of town. No viability issues, no significant on or off-site abnormal development costs, and can contribute to land supply'</i>.</p>	<p>A full appraisal of this site is provided in annex 3 and a summary matrix is provided below.</p>
<p><b>Changes to the Plan</b></p>	
<p>This alternative site is not preferred given that there are a number of constraints to the site including topography and highways access. Although access is achievable, work would require significant excavation and would constrain the delivery of the expected yield.</p>	

**Summary Matrix – OTIVNEW New Site Land at Seven Crosses Hill**

	Alternative
Sustainability Objective	Land at Seven Crosses Hill
A	-1
B	0/?
C	0/?
D	-1
E	+1
F	+2
G	+3
H	+1
I	-1/?

**Cullompton**

**CU1-CU6 North West Cullompton**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<p>1. Education counted as part of the 21,000sqm commercial floorspace. A representation was made during the Local Plan Review Proposed Submission consultation which noted that <i>‘whilst the use of the wider definition of employment is supported, the 21,000sqm of commercial floorspace in policy CU1 should include reference to education’</i>.</p>	<p>2.1ha identified for the school could amount to 21,000sqm of commercial floorspace and would not enable the provision of other employment generating uses for the area. Taking into account the potential for 21,000sq m of commercial floorspace that could be lost in the allocation the result would be a greater negative impact on objective E) promoting economic growth and employment. Overall a slight positive instead of a significant positive effect would be considered (+1).</p>
<p>2. Include the whole of the proposed Growen Farm option for development as part of the North West Cullompton allocation. Various representations were made during the Local Plan Review Proposed Submission Consultation which suggested the full allocation of the Growen Farm option. In response to these comments an alternative of the inclusion of the whole of the proposed Growen Farm option for development as part of the North West Cullompton allocation has been considered.</p>	<p>This alternative would result in a greater negative score for objective A) protection of the natural environment in which the 2014 Landscape and Visual Appraisal on Strategic Site Options report identified the eastern field segments of the Growen Farm land as not suitable for development. A summary matrix is provided below.</p>
<b>New Information</b>	

<p>3. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies the same elements as mentioned in the SA but provides greater detail on the impact of each element and mitigation options available.</p>	<p>This would have no change to the pre or post mitigation SA scores as the SA already recognises the elements identified in the HEA. The recommendations in the HEA can be taken into account as part of the masterplanning exercise which is identified in the SA as a mitigation. No change to the SA is proposed.</p>
<p>4. Contributions from development to Town Centre relief road and J28. Also note a change to the total commercial floorspace is proposed in-line with the adopted North West Cullompton masterplan to 10,000sqm.</p>	<p>Overall this will improve the post-mitigation score of objective 1) delivering the necessary infrastructure to +3 given the development of this site will help to deliver multiple significant infrastructure projects which will benefit the wider community. This is the preferred alternative. The change to the total commercial floorspace does not affect the scoring of the site as it still provides large scale commercial development in-line with the appraisal guidance of the SA.</p>
<p>5. Re-allocation of land to the south west of the site.</p>	<p>This would make no changes to the SA scores of the site. The area included has been previously allocated and appraised. The cumulative impact of developing sites at Cullompton is discussed in annex 1.</p>
<p><b>Sustainability Appraisal Comments</b></p>	
<p>6. A representation was made during the Local Plan Review Proposed Submission consultation and stated that their <i>‘Accompanying appraisal (submitted with rep) scores this site a post-mitigation score of -2 for objective A) protection of the natural environment.’</i> Mr Christian &amp; Mr Force c/o Genesis Town Planning (3780)</p>	<p>It is agreed that the impact on landscape was not fully reflected in the proposed submission SA scoring and a slight negative score is considered. It is however not agreed that a negative (-2) score is appropriate given that mitigation has been considered as part of the site including not allocating the most sensitive area of Growen Farm to reflect the findings of the Landscape and Visual Appraisal as well as positive impacts of environment protection and enhancement and</p>

	provision of Green Infrastructure set out in the policy. However as noted in the rep and the proposed submission SA text, given the level of development the proposal is considered to have an impact on the character of the area and this was not previously reflected in the original score. This has been reflected in the updated appraisals below.
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**Changes to the Plan**

The new information provided in alternatives 4 and 5 are proposed as modifications to the plan. The representation made in alternative 6 is also agreed and proposed a change to the SA scores as identified in the matrix below. A change to the SA scoring is also proposed following the comment made in alternative 6.

**Summary Matrix - CU1-CU6 North West Cullompton**

Sustainability Objective	Preferred	Alternative		
	Contributions to wider infrastructure	Proposed Submission Policy SA	Education incl. as commercial	Including Growen Farm
A	-1	0	-1	-2
B	-1/?	-1/?	-1/?	-1/?
C	+1/?	+1/?	+1/?	+1/?
D	-3	-3	-3	-3
E	+3	+3	+1	+3
F	+2	+2	+2	+2
G	+3	+3	+3	+3
H	+2	+2	+2	+2
I	+3	+2	+2	+2

**CU7-CU12 East Cullompton**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<p>1. No quantum specified for criteria b) green infrastructure and c) public open space. A representation was made during the Local Plan Review Proposed Submission consultation which noted that they <i>‘Support the principles of this policy (CU9 East Cullompton Environmental Protection and Green Infrastructure) and recognise the importance of green infrastructure. However would wish to see more flexibility to the quantum identified in criteria b and c. The level of provision should be agreed as part of the master planning work and removed from the local plan policy’.</i></p>	<p>This alternative would result in an element of greater uncertainty for objective A) Protection of the natural environment to -1/? given that without the broad quantum of strategic green infrastructure set out in policy the mitigation this will provide is uncertain. A greater negative effect although uncertain, is also considered for objective H) (-1/?) ensuring community health and wellbeing in which the required green infrastructure and areas of public open space identified to meet the needs of the new community may not be provided.</p>
<p>2. Proposed Submission version East Cullompton with landswap part of site – Land at ‘Newland Persey’ replaced with land at ‘Cooke’. East Cullompton total 166 ha site area. A representation was made during the Local Plan Review Proposed Submission consultation which suggested <i>‘the best way forward for all parties would be for me to offer my 45 acres...on the north side of the A373 in exchange for the land at Newlands Farm on the south side of the A373’.</i></p>	<p>This alternative would result in the same scoring in the SA as the Proposed Submission option given that the landswap proposed is in the same landscape character area and has similar features to the rest of the East Cullompton site. An additional appraisal has not been provided given the same scoring.</p>
<p>3. East Cullompton Aller Barton Farm and land south of Honiton Road. 181ha site. A representation was made during the Local Plan Review Proposed Submission consultation which suggested <i>‘I would</i></p>	<p>This alternative scores less positively in objective B) protection and promotion and potential of quality built environment. A greater uncertain effect is considered for objectives A) protection of the natural environment, H) community health and wellbeing and I)</p>

<p><i>repeat my offer to move if you take the whole of my farm....making land available up to the Cullompton/Plymtree road'.</i></p>	<p>delivering the necessary infrastructure. The site does however score more positively in objective D) safeguarding the minimising resource use. A full appraisal is provided in annex 3 and a summary matrix is provided below.</p>
<p><b>New Information</b></p>	
<p>4. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies that the site is close to a number of listed building including the grade II Higher Moorhayes Farmhouse building and front garden wall and the grade II Lower Moorhayes former farmhouse. Both listed buildings lie to the north east edge of the allocation with Lower Moorhayes most closely affected. These listed building were not previously identified in the SA. All other elements noted in the HEA were noted in the SA previously and would not affect the SA score.</p>	<p>The SA did not previously identify the listed buildings noted in the HEA in which a pre-mitigation score of -2/? Is considered. The HEA recommends careful consideration with regard to proximity of new buildings, together with the details of design materials and colour palette used. The policy already requires a public masterplanning exercise to ensure the quality of the final design of development which will provide mitigation. The HEA suggests that Lower Moorhayes should be provided with a planted buffer zone to the south side. A modification has been recommended to add an additional criterion to state 'Design solutions which respect the settings of listed buildings adjoining the site'. With this mitigation in place it is considered the post-mitigation score will remain the same.</p>
<p><b>Sustainability Appraisal Comments</b></p>	
<p>5. A representation was made during the Local Plan Review Proposed Submission consultation which suggested '<i>East Cullompton option should score a +2 positive impact under H) ensuring community health and wellbeing based on provision of public open space, public access points, community services and facilities etc'.</i></p> <p>Pegasus Planning (3678)</p>	<p>The reasons set out in the comment have been considered in the scoring of East Cullompton as set out in the 'mitigation' commentary which improves the original score of -3 to 0. The +2 score is not agreed. Therefore no change is proposed.</p>



<p>6. Disagree with part I) 'Commitment' to improvements at J28. Believe it is uncertain. Hallam Land Management (4386)</p>	<p>Not agreed Part 'I' does not mention 'commitment' to improvements at J28 but does identify a phasing strategy and provision of mitigation measures to ensure only acceptable impacts occur to J28. The Council has been working closely with statutory consultees to ensure emerging proposals for junction 28 M5 improvements are appropriately designed.</p>
<p>7. A representation was made during the Local Plan Review Proposed Submission consultation and stated that their '<i>Accompanying appraisal (submitted with rep) scores this site a post-mitigation score of -1 for objective A) protection of the natural environment.</i>' Mr Christian &amp; Mr Force c/o Genesis Town Planning (3780)</p>	<p>The representation concludes the same score as the SA.</p>
<p><b>Changes to the Plan</b></p>	
<p>Alternative 4 is preferred. The additional criterion provides mitigation and protection to the historic environment although the SA score remains the same. All other alternatives are not preferred. For alternative 2 although the resultant scoring is the same as the Proposed Submission option, the delivery of this alternative would be more challenging. The Landscape and Visual Appraisal 2014 notes that development North of Honiton Road, development would be phased west to east with an intermediate threshold at the linear woodland. Extension of development beyond that boundary might be possible in the longer term, but would need to be subject to a more detailed assessment to determine the effect on the wider landscape and visibility from the AONB. The area to the South of Honiton Road, development is less constrained and would be undertaken across much of the site. Therefore the land swap proposed would affect delivery rates with the proposed substituted land only be delivered at the end of development instead of earlier on in the development, in which the area South of Honiton Road could be provided. Alternative 3 is not preferred. The unusual shape and separation of the site with existing development to the west raises concerns about how well the final design could integrate the existing and proposed development. The unusual shape with only access to the east of the site also raises a level of uncertainty in providing accessible forms of travel and providing the necessary infrastructure. No changes to the SA are proposed following comments on the SA in alternatives 5 to 7.</p>	

**Summary Matrix – CU7-CU12 East Cullompton**

	Preferred	Alternative	Alternative
Sustainability Objective	Proposed Submission Policy	No specific quantum for GI and open space	Aller Barton Farm S. Honiton Rd
A	-1	-1/?	-1/?
B	0/?	0/?	-2/?
C	0/?	0/?	0/?
D	-3	-3	-2
E	+3	+3	+3
F	+1/?	+1/?	+1/?
G	+3	+3	+3
H	0	-1/?	0/?
I	+2	+2	+2/?

**CU13 Knowle Lane**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>Sustainability Appraisal Comments</b>	
1. A representation was made during the Local Plan Review Proposed Submission consultation and stated that their <i>'Accompanying appraisal (submitted with rep) scores this site a post-mitigation score of 0 for objective A) protection of the natural environment.'</i>	The representation concludes the same score as the SA.

Mr Christian & Mr Force c/o Genesis Town Planning (3780)	
<b>Changes to the Plan</b>	
The comment made would result in no changes to the Plan or SA.	

**Summary Matrix – CU13 Knowle Lane**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**CU14 Ware Park and Footlands**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<b>New Information</b>	
1. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies that the site lies some distance to the south west of St Andrew’s Hill (a Roman fort and Scheduled Ancient Monument) and to the south of a possible road leading west from the fort. The SA did not previously identify these heritage elements. All other elements noted in the HEA were noted in the SA previously and would not affect the SA score.	The HEA states that the proposed development would have no anticipated heritage aspect, therefore no change to the SA is proposed.
<b>Sustainability Appraisal Comments</b>	
2. A representation was made during the Local Plan Review Proposed Submission consultation and stated that their <i>‘Accompanying appraisal (submitted with rep) scores this site a</i>	The representation concludes the same score as the SA.

<p><i>post-mitigation score of 0 for objective A) protection of the natural environment.'</i></p> <p>Mr Christian &amp; Mr Force c/o Genesis Town Planning (3780)</p>	
<b>Changes to the Plan</b>	
None of the alternatives would result in any changes to the Plan or the SA.	

**Summary Matrix - CU14 Ware Park and Footlands**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**CU15 Land at Exeter Road**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<b>New Information</b>	
<p>1. Site allocation proposed to be reduced to 24 dwellings. Site has permission for 24 dwellings, there is no confirmation that the remainder of the site is deliverable and is unlikely to make the contribution in numbers stipulated by the original proposed policy.</p>	No changes to the SA are expected.
<b>Sustainability Appraisal Comments</b>	
<p>2. A representation was made during the Local Plan Review Proposed Submission consultation and stated that their <i>'Accompanying appraisal (submitted with rep) scores this site a post-mitigation score of 0 for objective A) protection of the natural environment.'</i></p> <p>Mr Christian &amp; Mr Force c/o Genesis Town Planning (3780)</p>	The representation concludes the same score as the SA.
<b>Changes to the Plan</b>	

The comment made would result in no changes to the Plan or SA.

**Summary Matrix - CU15 Land at Exeter Hill**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**CU16 Cummings Nursery**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>Sustainability Appraisal Comments</b>	
1. A representation was made during the Local Plan Review Proposed Submission consultation and stated that their <i>'Accompanying appraisal (submitted with rep) scores this site a post-mitigation score of 0 for objective A) protection of the natural environment.'</i> Mr Christian & Mr Force c/o Genesis Town Planning (3780)	The representation concludes the same score as the SA.
<b>Changes to the Plan</b>	
The comment made would result in no changes to the Plan or SA.	

**Summary Matrix - CU16 Cummings Nursery**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**CU17 Week Farm**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
1. A representation was made during the Local Plan Review	This alternative would suggest the broadening of employment

Proposed Submission consultation which suggested that 'Allocation should include space for retail outlets of similar size to Aldi'.	floorspace to A class which could have a negative effect on the town centre by providing main town centre uses out of town centre. Therefore a negative effect (-2) is considered for objective F) supporting retail.
<b>Changes to the Plan</b>	
No changes to the plan are proposed. The alternative suggested is considered less sustainable and therefore not preferred.	

**Summary Matrix - CU17 Week Farm**

	Preferred	Alternative
Sustainability Objective	Proposed Submission Policy	Include use class A
A	0	0
B	0/?	0/?
C	0	0
D	-2	-2
E	+3	+3
F	0	-2
G	0	0
H	-1	-1
I	0/?	0/?

**CU18 Venn Farm**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<p>1. A representation was made during the Local Plan Review Proposed Submission consultation and noted that the <i>'allocation should be extended to incorporate adjacent 8 hectares; new housing growth will benefit from additional employment, Cullompton is strategically placed on M5 and larger site will help support the infrastructure costs of the site (i.e. land needed for flood zone, habitats, link road)'</i>.</p> <p>This alternative is similar to the consideration of a combined allocation of the three sites A) Venn Farm B) Land adj Venndale NW Long Moor Road C) NW Kingsmill Industrial Estate in Cullompton considered at the Local Plan Review options consultation. In response to this alternative, the combined allocation of 13.2ha of 31,090sqm commercial floorspace has been considered.</p>	<p>This alternative has been considered as it is distinct to the proposed option. However upon appraisal as the proposed site and the alternative both fell within the same grouping i.e. over 10,000sqm commercial floorspace and were in the same location it led to matching results in the SA. As such no appraisal or summary matrix is provided as the results are the same as the proposed submission.</p>
<p><b>Changes to the Plan</b></p>	
<p>Alternative 1 is not preferred as the additional commercial development is not necessary. The Local Plan Review already allocates sufficient provision.</p>	

**Summary Matrix - CU18 Venn Farm**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**CU19 Town Centre Relief Road**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>New Information</b>	
<p>1. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies that parts of the site include or are close to the conservation area including the historic mill leat. Several listed buildings nearby including Grade I St Andrews church. Grade II listed first bridge is located to the south. The HEA also identifies the site lies within a landscape that has evidence of prehistoric and Roman activity recorded, elements which were not previously picked up in the SA.</p>	<p>This information would change the pre-mitigation score to a -3/? for objective B) the built and historic environment. Recognising the potential impact on the listed buildings and conservation area as well as the possibility of archaeological deposits. However much of the impact will depend on the line of the proposed road and its design. The policy includes a requirement for public consultation which will help provide for the most appropriate design provision. An amendment to the policy and supporting text has been proposed which ensure the protection of the setting of listed buildings, conservation area and the provision of archaeological investigation and mitigation. It should also be recognised that a town centre relief road would result in major public benefits making the town centre a more pleasant environment and enabling an upgrade of the historic environment by improving the setting of a large number of listed buildings. Therefore post mitigation score is suggested to be a neutral although uncertain effect 0/?.</p>
<b>Changes to the Plan</b>	
Amendments to the policy and supporting text are proposed which ensure the protection of the setting of the listed buildings and	



conservation area and ensures the provision of archaeological investigation and mitigation.

**Summary Matrix - CU19 Town Centre Relief Road**

	Preferred	Alternative
Sustainability Objective	New HEA info	Proposed Submission Policy
A	-2	-2
B	0/?	+1
C	+2	+2
D	-1	-1
E	+2	+2
F	+2	+2
G	0	0
H	+2	+2
I	+3	+3

**CU20 Cullompton Infrastructure**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
1. A representation was made during the Local Plan Review Proposed Submission consultation and which <i>'Requests additional criterion stating 'provision of works to reduce flood risk'</i> .	This alternative would result in a greater positive impact on objective c) Mitigating the effects of climate change. Overall with the positive impact of this criterion, CU20 scores +3 post mitigation for objective c).

### Changes to the Plan

Alternative 1 is proposed as a modification to the plan. This alternative would result in an improved score for objective c) mitigating the effects of climate change. Cullompton is a Critical Drainage Area which requires measures to reduce flood risk (above those expected elsewhere) therefore it is considered that the modification proposed by alternative 1 is beneficial in improving the sustainability of this policy.

### **Summary Matrix - CU20 Cullompton Infrastructure**

	Preferred	Alternative
Sustainability Objective	Include flood risk criterion	Proposed Submission Policy
A	-2	-2
B	+2	+2
C	+3	+2
D	+1	+1
E	+2	+2
F	+2	+2
G	+2	+2
H	0	0
I	+3	+3

**CU21 Land at Colebrook CONTINGENCY SITE**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<p>1. 19.3ha, 400 dwelling site.            A representation was made during the Local Plan Review Proposed Submission consultation and noted that they object <i>‘to exclusion of 16.8ha site as a full allocation within the plan/objects to inclusion of 4.8ha as contingency site only. Minimum of 400 dwellings should be allocated within the site area of 21.6ha’</i>            In response to this representation an alternative of 19.3ha for 400 dwellings was considered. This represents the full area proposed as part of the options consultation. 16.8ha referred to in the options allocation and 21.6ha referred to in the representation are both errors in measuring the size of the full allocation.</p>	<p>In considering this alternative in comparison to the preferred option of 4.8ha 100 dwellings, the site would score less post-mitigation on objective A) protection of the natural environment in which a slight negative -1 score is considered due to the larger site reflected and the potential impact on the landscape. It also scores more negatively in objective I) delivering the necessary infrastructure with a negative score of -2 as the site is of a scale that is significant enough to affect the local road network. A full appraisal is provided in annex 3 and a summary matrix is provided below.</p>
<b>Sustainability Appraisal Comments</b>	
<p>2. A representation was made during the Local Plan Review Proposed Submission consultation which argued that the SA <i>‘Has not properly considered all site alternatives at Cullompton. Colebrook at 16.8ha, 300 dwellings should be considered’.</i>            Mr Christian &amp; Mr Force &amp; Mr Christian c/o Genesis Town Planning (3780)</p>	<p>A larger site of 16.8ha of 300 dwellings was considered at the Local Plan Review options consultation although the SA at that time did not consider post-mitigation scores. As noted in alternative 1, 16.8ha referred to in the options allocation was an error in measuring the size of the allocation. As such an appraisal for the full allocation of 19.3ha for 400 dwellings has been considered in this SA as set out in alternative 1. A full appraisal is provided in annex 3 and a summary matrix is provided below.</p>
<p>3. A representation was made during the Local Plan Review</p>	<p>The representation concludes the same score as the SA.</p>

<p>Proposed Submission consultation and stated that their <i>'Accompanying appraisal (submitted with rep) scores this site a post-mitigation score of 0 for objective A) protection of the natural environment.'</i></p> <p>Mr Christian &amp; Mr Force c/o Genesis Town Planning (3780)</p>	
<p>4. A representation was made during the Local Plan Review Proposed Submission consultation and stated that their <i>'Accompanying appraisal (submitted with rep) states landscape impact for the larger proposed site is same as other allocated large sites in Cullompton, i.e. slight negative impact.'</i></p> <p>Mr Christian &amp; Mr Force c/o Genesis Town Planning (3780)</p>	<p>The representation concludes the same score as the SA.</p>
<p><b>Changes to the Plan</b></p>	
<p>Alternative 1 is not preferred given that the site is of a scale that is significant enough to affect the local road network.</p> <p>Alternative 2 is a comment on the SA which identifies that a full appraisal has not occurred for the larger Land at Colebrook alternative. In response to this a full appraisal has been undertaken with a summary matrix provided below.</p> <p>Alternative 3 and 4 conclude the same score as the SA, as such no changes are proposed.</p>	

***Summary Matrix - CU21 Land at Colebrook***

	Preferred	Alternative
Sustainability Objective	Proposed Submission Policy	Larger site 19.3ha, 400 dwellings
A	0	-1
B	0/?	0/?
C	+1	+1
D	-2	-2
E	+1	+1
F	+1	+2
G	+3	+3
H	0	0
I	0/?	-2

## Cullompton Alternative Options

### OCUNEW Tiverton Road

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<p>1. A representation was made during the Local Plan Review Proposed Submission consultation and objected to the omission of this site. <i>'Site is previously developed land and is not affected by constraints of larger, infrastructure-dependent sites. Can accommodate 13-19 dwellings. Site is within walking distance of bus services, and is within single ownership. Site serves wide catchment so redevelopment would not result in loss of a local community facility. Pre-development conditions would cover contamination, transport statement and travel plan, archaeological investigation, biodiversity survey, screening/safety/security from adjacent sub-station'.</i></p>	<p>A full appraisal of this site is provided in annex 3 and summary matrix is provided below.</p>
<b>Changes to the Plan</b>	
<p>Alternative 1 is not preferred. Although the post-mitigation scoring is relatively neutral, the unknown impact with regard to the potential loss of a community facility could amount to a negative impact on objective H) ensuring community health and well-being. It has been scored a neutral effect as the representation made as part of the Local Plan Review Proposed Submission consultation has argued there would be no loss of a local community facility as a new better site is preferable in a better location for congregation. However as there is no sufficient detail in the representation to be certain of this provision. Furthermore as this is a brownfield site within the settlement limit it does not need to be allocated for an application to come forward, as such, it is therefore not preferred.</p>	

**Summary Matrix – OCUNEW Tiverton Road**

	Alternative
Sustainability Objective	OCUNEW Tiverton Road
A	+1
B	0/?
C	0
D	+2
E	0
F	0
G	+1
H	0/?
I	0/?

**Crediton**

**CRE1 Wellparks**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>New Information</b>	
<p>1. A representation was made during the Local Plan Review Proposed Submission consultation and noted that they <i>'consider policy unsound - proposed allocation subsumes grade II listed farm complex and alters setting. Disputes assessment in recent planning application and states Historic Environment Appraisal needs to reassess the likely impact which the development will have on the Conservation Area (and presumably listed building?), if concludes there is harm, provide mitigation and if still harm justify allocation.'</i></p>	<p>A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies the same elements as mentioned in the SA in objective B, but provides further detail in the scope of the harm and mitigation options available; as such no change in the pre-mitigation score is considered. Detail in the HEA recognises the site now has outline planning permission with mitigation to protect the heritage assets impacted by the site. However the HEA does note that there will be some negative impact on the Conservation Area which was not previously recognised post-mitigation, as such a slight negative effect is considered post-mitigation (-1). HEA</p>
<b>Changes to the Plan</b>	
<p>No change to the plan is proposed however a change in the post mitigation score in objective b) for this site is considered with the effect changing from a neutral score (0) to a slight negative score (-1) given the potential impact on the conservation area.</p>	



**Summary Matrix - CRE1 Wellparks**

	Preferred	Alternative
Sustainability Objective	SA amendment objective B	Proposed Submission Policy
A	-1	-1
B	-1	0
C	+1	+1
D	-2	-2
E	+2	+2
F	+1	+1
G	+3	+3
H	+1	+1
I	0	0

**CRE2 Red Hill Cross, Exhibition Road**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>New Information</b>	
1. A representation was made during the Local Plan Review Proposed Submission consultation and noted that they consider that the <i>'Policy is currently unsound - no work in evidence base to assess impact on Shobrooke Park; appraisal needed, if concludes harm set out mitigation measures, if cannot be mitigated need to</i>	A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies Creedy Bridge and Cottages located to the north east. Shobrooke Historic

<i>justify allocation as per NPPF para 133 and 134.'</i>	Park located to the east, and Creedy Park to the north west. There is also a grade II listed chapel cemetery located toward the south. These elements were not previously picked up in the SA as such a pre-mitigation score of -2 from 0 is suggested. The HEA recommends mitigation in the form of a generous landscape margin on the east facing side of the site. A change to the plan is proposed to add to the supporting text, to reflect this recommendation. Therefore the post-mitigation score remains as 0.
<b>Changes to the Plan</b>	
In response to new information presented in alternative 1, a change to the plan to replace paragraph 3.160 with 'The site is in a prominent position, which is visible from historic Shobrooke Park to the east. Detailed design and development which respect local distinctiveness, including a generous landscape margin on the east facing side of the site will mitigate any potential impact' is proposed to reflect the recommendation in the HEA and provide mitigation for this preferred alternative.	

**Summary Matrix - CRE2 Red Hill Cross, Exhibition Road**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**CRE3 Cromwells Meadow**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<b>New Information</b>	
1. A representation was made during the Local Plan Review Proposed Submission consultation and noted that they consider that the ' <i>Policy is currently unsound - no work in evidence base to assess impact on Shobrooke Park; appraisal needed, if concludes</i>	A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies Creedy

<p><i>harm set out mitigation measures, if cannot be mitigated need to justify allocation as per NPPF para 133 and 134’.</i></p>	<p>Bridge and Cottages located to the north east. Shobrooke Historic Park located to the east, and Creedy Park to the north west. There is also a grade II listed chapel cemetery located towards the south. However the HEA also notes that the backdrop of existing Cromwells Meadow and Willow Walk provide a level of mitigation. The HEA also identifies the site lying in an area of archaeological potential. These features of the site were not previously picked up as part of the SA however as noted in the HEA some mitigation is provided by existing development, as such an overall pre-mitigation score of -2/? is considered for objective b) the built and historic environment. The HEA recommends that additional mitigation may be provided through landscaping along the sensitive boundary. An amendment to the supporting text has been suggested as a change to the Plan to reflect this recommendation. The HEA also notes that archaeological mitigation could be implemented through a condition granted to any consent. An amendment to the policy has been suggested to include a criterion which requires archaeological investigation and mitigation. As such overall a neutral although uncertain effect is considered for objective b) the built and historic environment, post-mitigation given the unknown element of the archaeological potential.</p>
<p><b>Changes to the Plan</b></p>	
<p>In response to new information presented in alternative 1, a change to the Plan to add to the supporting text a new sentence which states ‘Appropriate landscaping will be required along the eastern boundary given the potential visibility of the site from historic Shobrooke Park’ is recommended in response to the HEA. Similarly a criterion to the policy to ensure archaeological investigation and mitigation is suggested.</p>	

**Summary Matrix - CRE3 Cromwells Meadow**

	Preferred	Alternative
Sustainability Objective	SA amendment objective B	Proposed Submission Policy
A	0	0
B	0/?	0
C	0	0
D	-1	-1
E	0	0
F	+1	+1
G	+2	+2
H	0	0
I	0	0

**CRE4 Woods Group, Exeter Road**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>New Information</b>	
1. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identified non listed heritage assets on the site which should be	When taking into account the potential positive impact of the site on the conservation area with redevelopment, but the negative impact if there is a loss of the unlisted heritage assets as noted in the HEA the impact on objective b) protection and promotion of a quality built and historic environment pre-mitigation is considered to change to a

<p>retained, this was not previously recognised in the SA. All other aspects identified in the HEA have been previously considered in the SA.</p>	<p>neutral although uncertain effect (0/?) from a slight positive effect. The uncertainty is due to the unknown design of the site and whether the unlisted heritage asset buildings will be retained. The HEA suggests the retention of the non-listed heritage assets as mitigation. As such a change to the policy supporting text is recommended in which retains these non-listed heritage assets with the overall post-mitigation score remaining as a slight positive effect (+1) given that the site at present is run-down and detracts from the area and the redevelopment of the site has the potential to enhance the local street scene and conservation area.</p>
<p><b>Changes to the Plan</b></p>	
<p>A change to the policy supporting text is recommended retaining the non-listed heritage asset buildings within the site.</p>	

**Summary Matrix – CRE4 Woods Group, Exeter Road**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**CRE5 Pedlerspool**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<p>1. A representation was made during the Local Plan Review Proposed Submission consultation and noted <i>‘As set out in evidence report, new primary school required in Crediton. Policy should be amended to include provision for this new school.’</i></p>	<p>The change in policy would result in an increased post-mitigation score from 0 to +2 in objective I) delivering the necessary infrastructure. The loss of the extra care scheme although would have an impact on the development proposal, the scoring in the SA would not change as the proposal would still provide a significant contribution towards meeting the housing needs of the population of</p>

	Crediton and therefore objective G) meeting housing needs still scores +3.
<b>New Information</b>	
<p>2. A representation was made during the Local Plan Review Proposed Submission consultation and noted that they consider that the <i>'Policy is currently unsound – what is impact on registered parks of Shobrooke and Creedy? Landscape assessment only considers Creedy but is inadequate in terms of assessment of impacts and mitigation. Historic environment appraisal needs to assess impact upon park and garden, if concludes harm then set out mitigation measures, if cannot be mitigated need to justify allocation as per NPPF para 133 and 134.'</i></p>	<p>A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. The HEA identifies Creedy Bridge and Cottages located to the north east. It also identifies Shobrooke Historic Park located to the east, a grade II chapel cemetery located towards the south and an area of archaeological potential which were not previously identified in the SA. The HEA also identifies Creedy Park which was previously identified in the SA. Taking the new information into account and the already identified information, the effect pre-mitigation would change the score to a -3/? from a -2 given the additional historic assets identified and uncertainty of impact on archaeological potential. The policy however already affords protection to Creedy Historic Park and Garden and provides for archaeological investigation and mitigation. The HEA noted that the north west boundary, due to its close proximity, is also vulnerable to harm. It recommends a mitigation strip of new tree planting along the full length of this boundary to reinforce the existing screening provided by trees on the edge of Creedy Park. The HEA also recognises the policy provides for landscape strips to the NE and SW sides which would provide mitigation. The policy already includes a criterion to protect TPO's and the supporting text already suggests a buffer of trees should be provided around and within the site reflecting historic planting to extend and soften the transition into</p>

	<p>the Green Infrastructure proposed. In terms of Shobrooke Park mitigation proposed in CRE2 is noted in the HEA, however additional mitigation in this policy is not suggested. As such the post-mitigation score remains as -1 although this is uncertain given the unknown archaeological potential element therefore overall score is considered to be -1/? which was not recognised previously. No other mitigation options are recommended.</p>
<p><b>Sustainability Appraisal Comments</b></p>	
<p>3. A representation was made during the Local Plan Review Proposed Submission consultation and noted that they <i>'Gypsy and Traveller Accommodation Assessment does not justify allocations on particular sites, nor is there justification or comparison of options in Sustainability Appraisal.'</i> MJ Gleeson c/o Bell Cornwell LLP (3775)</p>	<p>In response to this comment the general distribution of gypsy and traveller pitches has been assessed under the alternatives considered under S3 'Meeting Housing Needs'. Two alternatives, 'a town focussed urban extension' approach and 'rural distribution new sites' have been considered. Please see assessment under S3 with full appraisals provided in annex 3.</p>
<p><b>Changes to the Plan</b></p>	
<p>Alternative 1 is considered as a modification to the plan given it would improve have a positive impact on delivering the necessary infrastructure. Alternative 2 recognises additional historic assets not previously identified in the SA however the policy already affords mitigation recommended and no additional mitigation is recommended. Alternative 3 is considered under S3 with two alternatives for the general distribution of gypsy and traveller pitches assessed.</p>	

**Summary Matrix - CRE5 Pedlerspool**

	Preferred	Alternative
Sustainability Objective	Incl. new primary school	Proposed Submission Policy
A	-1	-1
B	-1/?	-1
C	0	0
D	-2	-2
E	+1	+1
F	+2	+2
G	+3	+3
H	+2	+2
I	0	+2

**CRE6 Sports fields, Exhibition Road**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<p>1. 2.8 ha with 50 dwellings</p> <p>This alternative re-considers the allocation as set out in the options consultation and provides post-mitigation scores. This takes into account the updated methodology for the appraisals of site options (as set out in the Local Plan Review Proposed Submission SA 2015) and enables the comparison of this smaller</p>	<p>This alternative scores very similarly to the preferred alternative given that this site has similar characteristics and location. It would score a slight positive effect (+1) rather than a positive effect on objective F) supporting retail given that the site does not propose any additional retail and the scale of the site is smaller than the proposed submission allocation. It would score less positively on objective G) meeting</p>



<p>site with the proposed submission preferred alternative.</p>	<p>housing needs with a positive effect (+2) rather than significant positive effect given the smaller scale of development proposed. All other objectives are considered to have the same post mitigation scoring. A summary matrix is provided below.</p>
<p><b>New Information</b></p>	
<p>1. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies the conservation area some distance west of the site and a grade II listed Chapel Cemetery some distance to the north which were not previously noted in the SA. It is however considered by the HEA that development in this location would have no anticipated heritage impact.</p>	<p>No change to the SA.</p>
<p><b>Changes to the Plan</b></p>	
<p>No changes to the Plan are recommended. Alternative 1 provides less benefit than the proposed submission allocation and is therefore not preferred.</p>	

**Summary Matrix – CRE6 Sports Fields, Exhibition Road**

	Preferred	Alternative
Sustainability Objective	Proposed Submission Policy	2.8ha, 50 dwellings
A	0	0
B	0/?	0/?
C	0	0
D	-2	-2
E	+1	+1
F	+2	+1
G	+3	+2
H	0	0
I	0/?	0/?

**CRE7 Stonewall Lane**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>New Information</b>	
1. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies the same heritage elements as the SA but in terms of	The score in the SA would remain as 0/? given the mitigation is already noted in the policy.

<p>Creedy Park it suggests mitigation through appropriate design and landscaping. Appropriate design and landscaping is recognised by the policy but it is not clear that this is relation to Creedy Park. As such a change to the supporting text is proposed to clarify the requirement of appropriate landscaping to ensure protection of heritage assets associated with the adjoining Creedy Park.</p>	
<p><b>Changes to the Plan</b></p>	
<p>A change to the supporting text of the Plan is recommended to provide clarity that adequate landscaping is provided to ensure the protection of heritage assets associated with the adjoining Creedy Park.</p>	

**Summary Matrix – CRE7 Stonewall Lane**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**CRE8 Barn Park**

No comments under CRE8 are considered to give rise to alternatives to be considered in this annex.

**CRE9 Alexandra Close**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<p><b>Sustainability Appraisal Comments</b></p>	
<p>1. The SA did not previously fully consider the impact on the high street through developing on the west of the town. Developing on the west would increase traffic through the high street as most likely destinations for journeys are either Exeter or Tiverton. Whilst some mitigation could be provided, the impact of</p>	<p>This would impact the pre-mitigation score for objective I) Infrastructure, to be -1 with the post-mitigation score remaining as 0, given that the site is only for 15 dwellings. It should however also be noted that developing in the west will have an impact on the secondary/cumulative/synergistic effects where incremental</p>

<p>developing sites on the east side of the town is likely to be much lesser than any on the west.</p> <p>Officer comment</p>	<p>development in the west of the town will have a cumulative effect on the traffic through the high street, discussed in annex 1. There would be a greater negative effect on objective H) ensuring community health and wellbeing due to the negative impact on air quality from developing to the west however given the scale of this site the score is considered to remain the same. This new information will also impact the scores for OCRE10 and OCRE11 which are discussed under 'Crediton Alternative Options' below.</p>
<p><b>Changes to the Plan</b></p>	
<p>No changes to the Plan are proposed.</p>	

**Summary Matrix – CRE9 Alexandra Park**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**CRE10 Land south of A377**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<p>1. A representation was made during the Local Plan Review Proposed Submission consultation and stated that they <i>'support the principle of the allocation but object to settlement limit as should be extended to fully cover the land within planning permission (ref 09/00244/MOUT); land is unquestionably suitable for a development allocation given planning history, established adjoining uses and accessible location.'</i></p> <p>An alternative is therefore considered which includes a small area</p>	<p>The increase in site area would amend the SA score for objective C) mitigating the effects of climate change to a pre-mitigation score of -2/? and a post-mitigation score would remain as 0/?. This is due to the increased area of flood zone 2 and advice from the EA that there could be increased flood risk to parts of the site covered by previous outline consents (alternative 3). Mitigation can be provided by design and new information set out in alternative 2 however this is still uncertain as the extent of flood risk is unknown.</p>

<p>to the south of the allocation up the edge of the swale, covered by recent consent sought by Mole Avon reflecting the permission above.</p>	
<p><b>New Information</b></p>	
<p>2. A representation was made during the Local Plan Review Proposed Submission consultation and stated that the <i>'Policy would be sounder if it referred to the need to ensure that ground and floor levels are set at sufficiently high enough level to cater for flood risk from the River Yeo.'</i></p>	<p>New information provided by the EA has indicated that this area is at greater risk of flooding than indicated at the time of the original permissions which covered the wider Tesco site. This new information would result in a greater negative pre-mitigation score to -2/?, however the post mitigation score would remain as 0/? as the supporting text will make reference to the latest flood data and implications from redevelopment with mitigation measures such as layout, site and floor levels.</p>
<p>3. A representation was made during the Local Plan Review Proposed Submission consultation and stated that they <i>'Consider the policy unsound - proposed allocation subsumes grade II listed farm complex and alters setting. Historic Environment Appraisal needed to assess the likely impact which the development will have on the listed buildings at Wellparks and Downes House Park and Garden. If concludes there is harm, provide mitigation and if still harm justify allocation as per NPPF paragraphs 133 and 134.'</i></p>	<p>A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies Wellparks grade II listed buildings located to the north west of the site which were not previously identified by the SA. The Downes Historic Park and Garden is also identified, although this is already recognised in the SA, development was previously considered to have no impact. However the HEA notes that there would be some potential impact on the two heritage assets which were not previously identified by the SA. As such the pre-mitigation score for objective b) built and historic environment, is proposed to be changed to a negative (-2) impact rather than neutral (0). Mitigation is suggested through sensitive</p>

	design with appropriate choice of materials and landscaping which has been included in the supporting text of the policy. The post-mitigation score therefore would remain a neutral effect.
<b>Changes to the Plan</b>	
Alternative 1 is proposed as a modification to the plan. Although the scoring is lower for the pre-mitigation score of objective c) mitigating the effects of climate change, it is considered appropriate and reasonable to allocate the site area which has outline consent and mitigation can be afforded to reduce the impact of flood risk. A Flood Risk Assessment will need to be submitted with any application on the site which will need to incorporate both a comprehensive level survey of the site's current arrangement, and additional modelling taking into account current levels. Alternative 2, related to alternative 1 is also proposed as a modification to the plan to reflect the new information presented by the EA which will help provide mitigation. Alternative 3 is also proposed as modification to the plan to ensure mitigation in the form of sensitive design with appropriate choice of materials and landscaping. With this mitigation the scores remain identical to the proposed submission policy site therefore a summary matrix is not provided below.	

**Summary Matrix - CRE10 Land South of A377**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**CRE11 Crediton Infrastructure**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
1. A representation was made during the Local Plan Review Proposed Submission consultation and stated that <i>'the policy would be more effective if 'provision of works to reduce flood risk' were included in the list.'</i>	This alternative would result in a greater positive impact on objective C) Mitigating the effects of climate change. Overall with the positive impact of this criterion CRE11 scores +3 post mitigation.
<b>Changes to the Plan</b>	
Alternative 1 is considered beneficial and therefore is proposed as a modification to the plan.	

**Summary Matrix - CRE11 Crediton Infrastructure**

	Preferred	Alternative
Sustainability Objective	Incl. flood risk criterion	Proposed Submission Policy
A	0	0
B	0	0
C	+3	+2
D	0	0
E	0	0
F	0	0
G	+2	+2
H	+3	+3
I	+3	+3

## Crediton Alternative Options

### Options to the West of the Crediton

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>Sustainability Appraisal Comments</b>	
<p>1. The SA did not previously fully consider the impact on the high street through developing on the west of the town. Developing on the west would increase traffic through the high street as most likely destinations for journeys are either Exeter or Tiverton. Whilst some mitigation could be provided, the impact of developing sites on the east side of the town is likely to be much lesser than any on the west.</p> <p>Officer comment</p>	<p>This would impact the scores for the alternative OCRE10 Westwood Farm in which the pre-mitigation score for objective I) Infrastructure, will be -2 and post-mitigation is considered to be -1 rather than neutral score to take into account the cumulative negative effect of traffic through the high street by developing to the west of the town. It will also impact OCRE11 Land at Chapel Down Farm in which a pre-mitigation score will be -3 and the post-mitigation score overall is considered to be -1. This takes into account existing proposed mitigation set out in the SA but the incremental negative effect of traffic through the high street. The impact of developing to the west of the town on air quality was previously considered in the SA, as such no change to the score or supporting text to objective H) is considered. Developing to the west Crediton is also discussed in annex 1 of this SA update.</p>
<b>Changes to the Plan</b>	
<p>It is considered that the comment made on the SA is beneficial to understand of the impact developing to the west of Crediton. The changes to the SA are therefore considered reasonable to include, however the amendment does not lead to any changes to the Plan.</p>	



**Summary Matrix – Crediton Alternative Options**

Sustainability Objective	Alternative			
	Proposed Submission SA CRE10	SA Amendment Objective I) OCRE10	Proposed Submission SA OCRE11	SA Amendment Objective I) OCRE11
A	0	0	-1	-1
B	0/?	0/?	-1/?	-1/?
C	0/?	0/?	0	0
D	-1	-1	-2	-2
E	0	0	+1	+1
F	+1	+1	+2	+2
G	+2	+2	+3	+3
H	-1	-1	0	0
I	0	-1	0	-1

## Land at M5 Junction 27

### Policy J27, Land at Junction 27 of the M5 motorway

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<p>1. On the 22<sup>nd</sup> September 2016 Full Council resolved to propose an allocation of 71 hectares between M5 Junction 27 and Willand for mixed commercial floorspace including a travel hub, agronomy visitor centre, outdoor adventure zone and outlet shopping village. The policy includes transport provision, environmental protection, a comprehensive phasing programme and public master planning exercise. In comparison to the Proposed Submission Sustainability Appraisal option, this commercial option encompasses a smaller site area, a number of the town centre uses have been withdrawn and new information has been provided to determine the retail impact. Taking the policy amendments and new information into account the allocation has been reappraised.</p>	<p>In comparison to the proposed submission M5 Junction 27 option, overall the site scores more positively for objective a) protection of the natural environment, d) safeguarded and minimising resource use and f) supporting retail. The proposed submission option scores more positively for objective h) as the option was previously considered as an alternative for a new community and provided community facilities. This is no longer proposed. Objective c) scoring has also been updated which was previously scored as a neutral although uncertain effect, upon review for both the preferred and alternative option they score a slight negative effect in considering additional trips will be generated from the development of this site.</p>
<b>New Information</b>	
<p>2. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identified that there are listed buildings close to the site and there may be some impact the immediate settings of these buildings. To</p>	<p>The new information has been reflected in the commentary of the Junction 27 full appraisal however the changes have not affected the scores pre or post mitigation.</p>

<p>some degree there will be an impact on the registered park and garden at Bridwell which is set on rising land to the east. To a limited degree the landscape settings of Sampford Peverell conservation area and the Grand Western Canal conservation area will also be affected. There is some uncertainty in the exact impact of the allocation given this will be dependent on site layouts, density, scale and design of buildings. This site occupies a substantial area within a landscape that has evidence of prehistoric and Roman activity, overall a negative and uncertain effect.</p>	
<p>3. A retail impact assessment has been carried out which included an assessment of 14 towns and city centres including those outside of Mid Devon District and concluded that all centres would continue to achieve higher future trading turnovers than the assessment year. The study also sets out how designer outlet villages differ from that in town centres and how they can be controlled by planning.</p>	<p>Given the changes proposed to the policy and the findings of the retail impact assessment, the proposal significantly enhances the retail offer of the district and therefore a significant positive impact is considered.</p>
<p><b>Sustainability Appraisal Comments</b></p>	
<p>4. A representation was made during the Local Plan Review Proposed Submission consultation and noted that <i>'Each score for J27 &amp; Willand is expressed at a '?'</i>. <i>Because of this it is questioned whether sufficient assessment has been carried out to reach a conclusion'</i>. This comment is relevant to both J27 commercial and residential options.</p>	<p>As noted in the SA methodology, in some instances where specific data was not available at the time of the SA assessments an uncertain effect has been identified. The exact impact in some cases will only be quantified at a planning application stage where detailed site based studies are undertaken based on the proposals. However information available at the time of the SA would give an indication whether the impact would be positive or negative, the question mark recognises</p>

<p>Hallam Land Management (4386)</p>	<p>that further studies would lead to greater certainty of impact. Where uncertainty is indicated the reasons for which are provided in the commentary as part of each SA appraisal. No change is considered.</p>
<p>5. A representation was made during the Local Plan Review Proposed Submission consultation and noted that <i>'SA landscape impacts of J27 given the scale of housing should be same as growth at Cullompton'</i>. This comment is relevant to the J27 residential option. Hallam Land Management (4386)</p>	<p>A landscape and visual appraisal was undertaken in 2014 focussing on the strategic site options as set out in the Local Plan Review evidence base. Using this evidence, J27 and the strategic option at Cullompton have been scored using the landscape and visual impacts specific to each site, rather than purely based on the scale of development. No change is considered.</p>
<p>6. A representation was made during the Local Plan Review Proposed Submission consultation and noted that <i>'Conversely to J28 in part I), J27 is stated as a negative effect which remains uncertain. SA fails to have regard to the Railway station which is accessible by foot and cycle, has existing bus routes and a cycle path running through it. It is close to existing schools and services.'</i> This comment is relevant to both J27 commercial and residential options. Hallam Land Management (4386)</p>	<p>A transport assessment is required to determine the exact impact of the development on transport hence an uncertain effect. The mitigation commentary already recognises the proximity of the site to the railway station and notes the provision of a dedicated bus and pedestrian route to the station. Therefore post-mitigation the score is positive when taking these features into account, although with an element of uncertainty for reasons set out above.</p>
<p>7. A representation was made during the Local Plan Review Proposed Submission consultation and noted that <i>'In comparing J27 and J28. Both cannot be determined until a retail impact assessment is carried out, but J27 scores -3 and J28 scores +1 against the same criteria'</i>. This comment is relevant to J27 commercial option. Hallam Land Management (4386)</p>	<p>The proposal at J27 has a significant commercial element proposed in comparison to the option at J28. Early indications raised concerns from neighbouring authorities regarding the impact on existing town centres. As such, a negative score was indicated. The J28 option 'East Cullompton' does not provide the level of retail as proposed in the J27 commercial option as such the impact was not considered to be as significant. However since the Proposed Submission Sustainability</p>

	<p>Appraisal a retail impact assessment has been carried out which concludes that given the criterion and controls in the proposed modifications policy all centres would continue to achieve higher future trading turnovers than the assessment year and as such the SA finds that the impact on objective f) Supporting retail will therefore be positive.</p>
<p>8. A representation was made during the Local Plan Review Proposed Submission consultation and noted that <i>'J27 should score higher than J28 on D) safeguarding and minimising resource use. Reason for a -3 at J27 fall on the potential constraint on future working at Hillhead Quarry. Believe this location has questions over viability of any such extraction'</i>.</p> <p>This comment is relevant to J27 commercial option.</p> <p>Hallam Land Management (4386)</p>	<p>As indicated by the uncertain scoring and the commentary, the questions over viability of extraction of Hillhead Quarry have been noted in the SA. However in considering the smaller allocation of land at Junction 27 and the updated Devon County Council Minerals Plan (proposed for adoption) it is now considered that the development of the site will not constrain future working of the remaining permitted reserves within Hillhead Quarry.</p>
<p><b>Changes to the Plan</b></p>	
<p>Option 1 is proposed as a change to the Plan. The proposed policy of a smaller site area with the new information provided results in the improved scoring in a number of objectives including retail impact. As such it is considered the proposal is beneficial and is proposed for allocation.</p>	

**Summary Matrix – OJ27**

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

**Rural Areas**

**Bampton**

**BA1 Newton Square, Bampton**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>New Information</b>	
<p>1. A representation was made during the Local Plan Review Proposed Submission consultation by Historic England and stated <i>‘Objection – development harms elements identified as important within Conservation Area Appraisal, which have not been considered within the Sustainability Appraisal; Historic Environment Appraisal needs to be undertaken to assess if there is harm and if so to suggest mitigation.’</i></p>	<p>A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies the same elements as the SA in terms of objective b) protection and promotion of a quality and built and historic environment. It notes that comments from Historic England may have incorrectly located the proposed allocation as being within an orchard referenced in the conservation area appraisal when in fact it is beside it. The HEA also notes that the impact on the setting of any listed building is likely to be minimal. The SA already identifies mitigation in the policy to ensure the Conservation Area is protected. No change to the SA is proposed.</p>
<b>Changes to the Plan</b>	
No changes to the Plan are proposed.	

**Summary Matrix – BA1 Newton Square, Bampton**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**BA2 Stone Crushing Works (Scott’s Quarry), Bampton**

No comments under BA2 are considered to give rise to alternatives to be considered in this annex.

**BA3 Ashleigh Park, Bampton**

No comments under BA3 are considered to give rise to alternatives to be considered in this annex.

**Bampton Alternative Options**

**School Close, Bampton (proposed for allocation BA4)**

<b>Reasonable Alternative Proposed</b>	
1. Allocation for 0.54(ha) 26 dwellings. The site was omitted in error.	Overall the site scores a neutral or positive score with regard to the objectives considered as part of this SA with the exception of objective D) safeguarding and minimising resource use which scores a slight negative -1 due to a small proportion of the site covering agricultural grade 3 land. As this site omitted in error a full appraisal is provided in annex 3 and summary matrix is provided below.
<b>Changes to the Plan</b>	
Alternative 1 is proposed a modification to the plan. The site scores either a neutral or positive score in all objectives in the SA with the exception of objective D) safeguarding and minimising resource use in which a slight negative score -1 is considered due to a small proportion of the site covering agricultural grade 3 land. The site is currently allocated and was omitted in error as some of the site has been built out. For consistency, similar to other sites in the plan, the remaining area of the allocation which has not yet been built is proposed to remain as an allocation in the plan.	



**Summary Matrix –School Close, Bampton**

	Preferred
Sustainability Objective	Former School, School Close Bampton
A	0
B	0
C	+1
D	-1
E	0
F	0
G	+2
H	0
I	0

**Bow**

**BO1 Land adjacent to Hollywell, Bow**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>New Information</b>	
1. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic	No change to the SA.

environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies there are many listed buildings in the centre of Bow and the village also has a conservation area which was not previously noted in the SA. However it states that these are some distance from the site which is unlikely to impact upon them.	
<b>Changes to the Plan</b>	
No changes to the Plan are proposed.	

**Summary Matrix – BO1 Land adjacent to Hollywell, Bow**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**BO2, West of Godfreys Gardens, Bow**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<b>New Information</b>	
1. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies there are many listed buildings in the centre of Bow and the village also has a conservation area which was not previously noted in the SA. However it states that these are some distance from the site which is unlikely to impact upon them.	No change to the SA.
<b>Changes to the Plan</b>	

No changes to the Plan are proposed.

**Summary Matrix – BO2 West of Godfreys Gardens, Bow**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**Bradninch**

**BR1 Hele Road, Bradninch**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>New Information</b>	
<p>1. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies that the site is opposite a locally listed heritage asset which was not previously identified in the SA. However, the HEA notes that although the asset's larger setting may be affected by development in this location, the asset's significance is not based on this larger setting and so the impact is low.</p>	<p>No change to the SA is proposed given that the impact to the heritage asset is considered to be low.</p>
<b>Changes to the Plan</b>	
<p>No changes to the Plan are proposed.</p>	

**Summary Matrix – BR1 Hele Road, Bradninch**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**Chawleigh**

**CH1 Barton, Chawleigh**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>New Information</b>	
1. A representation was made during the Local Plan Review Proposed Submission consultation and stated that <i>'Proposed allocation has potential to harm setting of Grade 1 church and conservation area; historic appraisal needed to reassess impact, if harm concluded set out mitigation, if harm still present justify allocation.'</i>	A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies that there are a number of listed buildings to the south and east of the site, including the grade I Church of St James which was not previously identified by the SA. The pre-mitigation score for objective b) the built and historic environment is proposed to be amended to -3/? from -2/? to take into account the potential impact on the listed building identified. The HEA suggests mitigation through high quality design of the development together with a landscape buffer on the east side of the site. If this is provided for the post-mitigation score will remain the same as 0/?
<b>Changes to the Plan</b>	
A change to the Plan is proposed to include an additional criterion to state 'design solutions which respects the setting of the conservation area and listed building'. An amendment to the supporting text is also proposed to ensure appropriate landscaping to mitigate any potential impact on the conservation area and listed buildings.	

**Summary Matrix – CH1 Barton, Chawleigh**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**Cheriton Bishop**

**CB1 Land off Church Lane, Cheriton Bishop**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>New Information</b>	
1. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies that the listed Old Rectory is located some distance to the north as well as the Cheriton Bishop Conservation Area which was not previously noted in the SA. However the HEA notes that there is no anticipated heritage impact.	No change to the SA is proposed.
<b>Changes to the Plan</b>	
No changes to the Plan are proposed.	

**Summary Matrix – CB1 Land off Church Lane, Cheriton Bishop**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**Cheriton Fitzpaine**

**CF1 Barnshill Close, Cheriton Fitzpaine**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>New Information</b>	
1. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA recognises that the site forms a significant location in terms of the entry to the more historic core of the village which was not previously identified in the SA. However the HEA recommends good design will likely mean minimal impact to the setting of the listed buildings and conservation area.	This would amend the pre-mitigation score to a slight negative -1 score. If good design is recognised to minimise the impact on the conservation area and listed buildings a neutral post mitigation score remains.
<b>Changes to the Plan</b>	
A change to the Plan to reflect the new information presented in alternative 1 in which good design should be used to ensure minimal impact to the setting of the historic environment is proposed.	

**Summary Matrix – CF1 Barnshill Close, Cheriton Fitzpaine**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**CF2 Land adjacent school, Cheriton Fitzpaine**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
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<b>New Information</b>	
1. A representation was made during the Local Plan Review Proposed Submission consultation and stated that <i>'Objects as infilling will ruin character of historic linear settlement.'</i>	A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA doesn't recognise the potential issue raised by the representation, as such no change to the SA or the Plan is proposed.
<b>Sustainability Appraisal Comments</b>	
2. A representation was made during the Local Plan Review Proposed Submission consultation and stated that they <i>'Questions positive +1 scoring given under Objective B for CF2 'Land adj school' but absence of similar score for OCF2 'Landboat Farm' (given 0) for increasing connectivity between main village and White Cross. Also states weight given to C19 farm buildings have little remaining value as historic assets.'</i> Garside Planning Services (3645)	The +1 score for CF2 'Land adj school' under objective B) is to reflect the improved connectivity between White Cross and the village. It is agreed that site OCF2 would also improve connectivity between White Cross and the village and therefore the SA scoring would be changed to +1 to reflect this as set out in the table below. However it is not accepted that the historic buildings on site have no heritage value. At the time of the proposed submission SA the C19 buildings referred to in the representation were not listed as heritage assets and although were acknowledged did not hinder the score of the objective for this site. However more recent advice from the conservation team identifies that the 19 <sup>th</sup> century buildings are 'pending' to be formally added to the list of heritage assets, as such if the buildings are assessed as heritage assets, the scoring of the SA will be amended to reflect this. No change to the SA with regard to CF2.
3. A representation was made during the Local Plan Review Proposed Submission consultation and stated that they <i>'Object to site and states that potential for landscape and visual impact is</i>	The school site (CF2) is on moderately higher ground than the objection site. However, within the context of the local landscape, both are relatively contained, with higher ground to north of

<p><i>greater than OCF2 particularly at western end of the site which would be visible from public highway; development of this site would break the skyline.'</i></p> <p>Garside Planning Services (3645)</p>	<p>proposed allocation and to south of objection site, with few opportunities for views in from long distances. The school site is visible from the public highway, but there is existing development along the south side of the road and buildings to the east and the school to the west. These buildings screen much of the site from views and provide a degree of mitigation to visual impact. Presence of dwellings on south side of highway means that skyline when viewed (from very limited viewpoints to south) is unlikely to be significantly altered. No change to the SA is proposed.</p>
<p>4. A representation was made during the Local Plan Review Proposed Submission consultation and stated that there is <i>'No current access to site, construction of which would have negative impact on visual amenity, as opposed to OCF2 which has existing access.'</i></p> <p>Garside Planning Services (3645)</p>	<p>There is a long site frontage on which to accommodate the appropriate visibility splays in a manner which minimises visual impact. This can be considered at design stage. No change to the SA is proposed.</p>
<p><b>Changes to the Plan</b></p>	
<p>None of the alternatives are preferred, as such no changes to the Plan are proposed. Alternative 2 is discussed in the table below on OCF2 Landboat Farm.</p>	

**Summary Matrix – CF2 Land adjacent school, Cheriton Fitzpaine**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.



**Cheriton Fitzpaine Alternative Options**  
**OCF2 Landboat Farm, Cheriton Fitzpaine**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>Sustainability Appraisal Comments</b>	
<p>1. A representation was made during the Local Plan Review Proposed Submission consultation and stated that they <i>'Disagree with -2 (pre-mitigation) scoring for OCF2 'Landboat Farm' and states should be same or better than CF2 'Land adj school' which is -1 for sustainability objective A. States landscape impact is not as great as stated, given limited scope for views to Raddon Hills. States open space south of Cherry Meadow acted as visual buffer to working farm but that function no longer required given relocation of facility elsewhere. States any trees lost could be made up by planting elsewhere. Visual impact is lesser than objection site due to presence of existing access point, and mitigation provided by existing development to west and east'</i>.</p> <p>Garside Planning Services (3645)</p>	<p>Additional site visits to both CF2 and OCF2 has enabled a re-examination of the potential impact against Objective A 'Protection of the natural environment'. Appraisal of the potential landscape impacts of the sites conclude that they are both relatively contained within the context of the local landscape. Higher ground exists to the north of this proposed allocation and to the south of the objection site, but there are few opportunities for views into either site from public access points. Both sites have built development on their boundaries which will provide some level of mitigation. The commentary within the SA for OCF2 has been amended to reflect this revision. The potential loss of trees is still a potential negative impact for OCF2 and therefore a -1 pre-mitigation score is proposed. However, both sites already have a 0 post-mitigation score which is considered to still apply given that other policies ensure appropriate mitigation of any harmful impacts.</p>
<p>2. A representation was made during the Local Plan Review Proposed Submission consultation and stated that they <i>'Question positive +1 scoring given under Objective B for CF2 'Land adj school' but absence of similar score for OCF2 'Landboat Farm'</i></p>	<p>The +1 score for CF2 'Land adj school' under objective B) reflects improved connectivity between White Cross and the village. It is agreed that site OCF2 would also improve connectivity between White Cross and the village and therefore the SA scoring is proposed</p>

<p><i>(given 0) for increasing connectivity between main village and White Cross. Also states weight given to C19 farm buildings have little remaining value as historic assets’.</i></p> <p>Garside Planning Services (3645)</p>	<p>to be changed to +1 to reflect this for both pre and post mitigation. However it is not accepted that the historic buildings on site have no heritage value. At the time of the proposed submission SA the C19 buildings referred to in the representation were not listed as heritage assets and although were acknowledged did not hinder the score of the objective for this site. However more recent advice from the conservation team identifies that the 19<sup>th</sup> century buildings are ‘pending’ to be formally added to the list of heritage assets, as such if the buildings are assessed as heritage assets, the scoring of the SA will be amended to reflect this.</p>
<p>3. A representation was made during the Local Plan Review Proposed Submission consultation and stated <i>‘Objective C, questions significance given to presence of Flood Zones 2 and 3 in scoring of OCF2 ‘Landboat Farm’.</i> States area was only included due to arbitrary drawing of the site boundary by the planning authority. Area could be omitted from any allocation. Questions rationale for site being given negative score as opposed to CF2 <i>‘Land adj school’ site’.</i></p> <p>Garside Planning Services (3645)</p>	<p>In comparing the sites, OCF2 does contain Flood Zones 2 and 3 in part. The NPPF states that planning should guide development to the areas of lowest flood risk. Sequentially therefore CF2, being 100% Flood Zone 1 is preferable. The commentary does acknowledge that the areas within the flood zones in OCF2 could be excluded as set out in the post-mitigation commentary and scoring. No change is proposed.</p>
<p>4. A representation was made during the Local Plan Review Proposed Submission consultation and stated that they <i>‘Question scoring given to Objective E ‘Promoting economic growth and employment. States farm buildings are redundant, following relocation of dairy business elsewhere’.</i></p> <p>Garside Planning Services (3645)</p>	<p>Additional site visits have highlighted that the farm buildings are indeed vacant and have been for some time. They are generally in a derelict state with no evidence of recent use. It is not considered that there would be a loss of employment land and the pre-mitigation score is proposed to be amended to 0. The post-mitigation score remains as 0 as mitigation in the appraisal suggested mitigation</p>

	measures for the initially identified negative effect on this objective.
<p>5. A representation was made during the Local Plan Review Proposed Submission consultation and stated that they <i>'Disagree with the amount of potential development possible at OCF2, Landboat Farm, given that part of site is within settlement limit, and that a similar density should be assumed to the proposed allocation to ensure like-for-like comparison'</i>.</p> <p>Garside Planning Services (3645)</p>	<p>Potential allocations went through a SHLAA panel process which provided recommendations on the technical capacity of each site. For consistency the same approach was used for all alternative sites. The scoring system has not 'hindered' this site in relation to the allocation CF2 'Land adj school' as both sites received a +2 post mitigation score against Objective G 'Meeting housing needs'. No change is proposed.</p>
<p>6. A representation was made during the Local Plan Review Proposed Submission consultation and stated that they <i>'Question - 1 score given to Objective H: Ensuring community health and wellbeing. States main reason for this is because site includes public open space which would be lost, but states as this is within settlement limit should not form part of consideration, and that loss has been overplayed. States that site could equally, as set out for CF2 'Land adj school' improve community cohesion through linking part of the village with White Cross and ensure short walking distances to school'</i>.</p> <p>Garside Planning Services (3645)</p>	<p>The potential loss of the public open space buffer is a consideration before mitigation. Disagree that it should not be considered as it's within the settlement limit. Its loss would present a negative impact. However on balance given the space did not form a formal designated open space area a pre-mitigation score of -1 rather than -2 was considered. In this Annex as noted in the table for CF2 above, OCF2 has community benefits of linking White Cross similar to CF2 which should be acknowledged. As a result it is proposed that the pre-mitigation score be improved to a neutral effect on balance. A post-mitigation score of +1 is now proposed provided that the loss of public open space can be mitigated.</p>
<p>7. A representation was made during the Local Plan Review Proposed Submission consultation and stated that they <i>'Question - 1 score given to pre-mitigation score for Objective I: Delivering the necessary infrastructure, compared with 0 for CF2 'Land adj school' when conclusion is that an adequate access is achievable for both'</i>.</p> <p>Garside Planning Services (3645)</p>	<p>The original site assessment was based on advice at the time that OCF2 would require additional works due to the restrictive alignments. However further site visits to both sites has identified that both sites can equally accommodate an access without significant works. Therefore an amendment is proposed to the pre-mitigation score to 0. The post-mitigation score remains as 0.</p>

### Changes to the Plan

No changes to the plan are proposed. The Local Plan Review allocates sufficient land for residential development to meet the district's housing need. The site scores similarly to the preferred alternative CF2 however the preferred alternative is sequentially preferable given that it's 100% Flood Zone 1 and avoids any loss of public open space. Although only two post-mitigation scores were slightly amended following the comments on above, a number of pre-mitigation scores have been changed, as such for clarity a full appraisal is provided in annex 3.

### **Summary Matrix – OCF2 Landboat Farm, Cheriton Fitzpaine**

Sustainability Objective	Alternative	
	Proposed Submission SA	SA Amendments
A	0	0
B	0	+1
C	+1/?	+1/?
D	-1	-1
E	0	0
F	0	0
G	+2	+2
H	0	+1
I	0	0

**OCFNEW Bramble Orchard, Cheriton Fitzpaine**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
1. A representation was made during the Local Plan Review Proposed Submission consultation which objected to plan allocations and submitted new land for housing and provision of alternative footpath for school use.	A full site appraisal has been provided for this option which can be found in annex 3 with a summary of scores provided below. The site scores more negatively than the preferred sites in Cheriton Fitzpaine on Objective A) protection of the natural environment, B) built and historic environment H) community health and well being and I) delivering the necessary infrastructure. The site is not preferred given there is likely to be a detrimental impact on the landscape and is divorced from the main settlement. There are also concerns around the provision of delivering the necessary infrastructure in which the topography and road widths result in a poor forward visibility from the site. The highway authority advises that the site should be rejected accordingly.
<b>Changes to the Plan</b>	
No changes to the plan are proposed. The highway authority advises that this site should be rejected.	

**Summary Matrix – OCFNEW Bramble Orchard**

	Alternative
Sustainability Objective	OCFNEW Bramble Orchard
A	-2
B	-1
C	+1
D	-1
E	0
F	0
G	+2
H	-1
I	-2/?

**Copplestone**

**CO1 The Old Abattoir, Copplestone**

No comments under CO1 are considered to give rise to alternatives to be considered in this annex.

**Culmstock**

**CL1 Linhay Close, Culmstock**

No comments under CL1 are considered to give rise to alternatives to be considered in this annex.

**CL2 Hunter's Hill, Culmstock**

No comments under CL2 are considered to give rise to alternatives to be considered in this annex.

**Halberton**

**HA1 Land adjacent Fishers Way, Halberton**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>New Information</b>	
<p>1. A representation was made during the Local Plan Review Proposed Submission consultation and stated that <i>'Site is less preferable to 'The Pethers' which is not within an area of archaeological potential, not at risk of flooding from groundwater or Grand Western Canal, and has better access to road network.'</i></p>	<p>The site 'The Pethers' has been appraised and discussed in a table below. New information for HA1 with regard to the area of archaeological potential since the Proposed Submission Local Plan Review SA has been made available. The Devon County Council Archaeology Team has confirmed that the scale and situation of the proposed allocation will not impact on any known heritage assets and state that they would not need to be consulted should an application come forward. Therefore both the pre-mitigation and post-mitigation scores have been amended to result in a less negative score to reflect this new information. The overall the pre-mitigation score is considered to be a slight negative impact given the potential impact on the conservation area as discussed in alternative 2 below. If mitigation is provided a post-mitigation neutral score remains although this is no longer uncertain.</p>
<p>2. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA recognises some potential impact on the setting of the Halberton</p>	<p>This new information would affect the pre-mitigation score in which taking into account new information presented in alternative 1 above and the new information in this alternative an overall slight negative (-1) score is considered. If mitigation through appropriate design, materials and landscaping is proposed a post-mitigation score of 0</p>

Conservation Area which was not previously identified by the SA. The HEA recommends appropriate design, materials and landscaping as mitigation to protect the setting of the conservation area.	remains.
<b>Changes to the Plan</b>	
A change to policy HA1 is proposed to delete reference to the need to ‘archaeological investigations and appropriate mitigation measures’ given the new information provided by the Devon County Council Archaeology Team that the proposed allocation will not impact on any known heritage assets and state that they would not need to be consulted should an application come forward. A change to the supporting text of HA1 is proposed to ensure mitigation through appropriate design, materials and landscaping to protect the setting of the Halberton conservation area and historic environment.	

**Summary Matrix – HA1 Land adjacent Fishers Way, Halberton**

	Preferred	Alternative
Sustainability Objective	SA Amendment Objective B)	Proposed Submission Policy
A	0	0
B	0	0/?
C	+1	+1
D	-2	-2
E	0	0
F	0	0
G	+1	+1
H	0	0
I	0	0



## Halberton Alternative Options

### OHA1 Land at Blundells Road, Halberton

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>Comments on Sustainability Appraisal</b>	
<p>1. A representation was made during the Local Plan Review Proposed Submission consultation and commented on the post mitigation score for objective A <i>'Disagree that screening should result in a mitigation score of 0'</i>.</p> <p>Individual (4447)</p>	<p>The mitigation score references S9 Environment and DM1 High Quality Design policies in the Local Plan Review. Screening may form part of the mitigation but would also include other criteria as set out in S9 and DM1. Policies in the Local Plan Review would be considered alongside any potential allocation, these policies provide mitigation of impacts to protect the natural environment; as such it was considered that there should be an improvement of the score of -1 pre-mitigation to 0 post-mitigation. No change is proposed.</p>
<p>2. A representation was made during the Local Plan Review Proposed Submission consultation and commented on the post mitigation score of objective B. <i>'The level of listing should be considered and argue that it is difficult to be confident of the outcome as there are unknowns through the mitigation elements of design and archaeological investigation'</i>.</p> <p>Individual (4447)</p>	<p>The listed buildings within the site have been considered as part of the impact on objective B. The 'level of listing' isn't considered to impact the scoring which is consistent with other appraisals in the SA although the presence of listed buildings has affected the pre-mitigation score. The post-mitigation score suggests that with appropriate mitigation a neutral score could be accomplished, however it is recognised there is a level of uncertainty particularly in considering the outcomes of the archaeological investigation which is recognised by '?' in the post-mitigation scoring column. No change is considered.</p>
<p>3. A representation was made during the Local Plan Review</p>	<p>The score referred to by the individual is the post-mitigation score.</p>

<p>Proposed Submission consultation and commented on the post mitigation score of objective B. <i>'Disagree with the equal scoring of Halberton, Land at Blundells Road and the preferred HA1 site for objective B as Halberton, Land at Blundells Road is within the Halberton conservation area and within the view of a grade II* listed building'</i>.</p> <p>Individual (4447)</p>	<p>Each site is different, and have different elements identified in objective B which covers a range of potential issues. The original scores and commentary recognises Halberton, Land at Blundells Road being within the conservation area and potential impact on nearby listed buildings. The equal scoring of the two sites following mitigation is due to responses which can help mitigate each impact. Although the impacts are different it was considered that it was possible to provide mitigation for each potential impact. No change is proposed.</p>
<p>4. A representation was made during the Local Plan Review Proposed Submission consultation and commented on the post mitigation score of objective C. <i>'Do not agree with the +1 score as there is an unknown impact and the benefits of the bus service should not improve the score'</i>.</p> <p>Individual (4447)</p>	<p>The scoring identifies that inherent with the watercourse there is a level of uncertainty through the indication of a '?'. The post-mitigation +1 score was provided as mitigation could neutralise the impact of the watercourse and the bus service was considered as a slight benefit of the location of the site. Consistent with other sites appraised in the SA, recognising the provision of a bus service in rural areas helps to differentiate between similar sites across Mid Devon, with some in locations with a bus service and others without. As the objective is considering climate change, the availability of sustainable modes of transport is an appropriate consideration in the sustainability of a site location. No change is considered.</p>
<p>5. A representation was made during the Local Plan Review Proposed Submission consultation and commented on the post mitigation score of objective I. <i>'Disagree that the post mitigation score should be 0 as it is unknown even if it is accompanied with a question mark'</i>.</p> <p>Individual (4447)</p>	<p>The post-mitigation score and commentary is to help identify whether the impact of the development can be mitigated and improve the overall score of the site. In this case the score post-mitigation was 0 based on the factors that could help reduce the impact of the development. A question mark is also used to recognise that there is some uncertainty until further detail is provided. No change is</p>

	considered.
<b>Changes to the Plan</b>	
None of the comments above are considered beneficial, therefore no change to the Plan or the SA scoring is proposed.	

**Summary Matrix – OHA1 Land at Blundells Road, Halberton**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**OHANEW The Pethers, Halberton**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<b>Comments on Sustainability Appraisal</b>	
<p>1. A representation was made during the Local Plan Review Proposed Submission consultation and commented that they <i>'object to the inclusion of HA1 site and offers preferable alternative'</i>. Compares site with Sustainability Appraisal scoring of HA1 Site. Argues that the new site is preferable over proposed allocation as has less archaeological potential, less likelihood of flooding and better access.</p> <p>Garside Planning Services (3645)</p>	<p>A full appraisal of the site has been undertaken which can be found in annex 3 with a summary matrix provided below. The site scores similarly to HA1. A benefit to HA1 is that it has an existing access whereas this new site does not although the scores in the SA remain the same for the post-mitigation score in objective I) Delivering the necessary infrastructure as access can be achieved for this site.</p>
<b>Changes to the Plan</b>	
HA1 was identified as the preferred site of Halberton Parish Council and the Local Plan Review allocates sufficient land for residential development to meet the district's housing need. No change is therefore proposed as the site is not preferential in replacement of the preferred site.	

**Summary Matrix – OHANEW The Pethers, Halberton**

	Alternative
Sustainability Objective	OHANEW The Pethers, Halberton
A	0
B	0
C	+1
D	-2
E	0
F	0
G	+1
H	0
I	0

**Hemyock**

**HE1 Depot, Hemyock**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>New Information</b>	
1. A representation was made during the Local Plan Review Proposed Submission consultation and brought forward new information in which <i>'Family member resident on site wishes to</i>	Given representations made during the Local Plan Review Proposed Submission (2015) consultation, the site is proposed for deletion as comments made raises an issue with the potential deliverability of the

<p><i>see it developed, but not in near future. Does not currently consider site deliverable due to third party access issues and landowners intention to continue trading’.</i></p>	<p>site and therefore the site is no longer considered a reasonable alternative. The site will have a limited impact on the Local Plan Review as a whole given its size and may still come forward as a windfall site as it falls within the settlement limit. This will have a limited impact on the sustainability of the plan as a whole given the scale of the site.</p>
<p><b>Changes to the Plan</b></p>	
<p>HE1 is proposed to be deleted from the plan as it is no longer considered a reasonable alternative given the representations made during the Local Plan Review questions its deliverability.</p>	

**Summary Matrix – HE1 Depot, Hemyock**

A summary matrix is not provided, the new information presented raises questions over the deliverability of the site and is proposed for deletion. This will have a limited impact on the sustainability of the plan as a whole given the scale of the site.

**Morchard Bishop**

No reasonable alternatives are proposed for allocations in Morchard Bishop.

**Newton St Cyres**

**NE1 Court Orchard, Newton St Cyres**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<p><b>New Information</b></p>	
<p>1. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential</p>	<p>The impact on the conservation area would amend the pre-mitigation score from -1/? to a -2/? score to take into account the potential detrimental impact on the setting and approach to the conservation</p>

<p>development and suggests mitigation where appropriate. The HEA notes that the site lies adjacent to the recently extended boundary of the Newton St Cyres conservation area. This was not previously identified in the SA. The HEA suggests that the proposed site would have a detrimental impact on the setting and approach of the conservation area. It suggests that access into the site will need careful design and landscaping to link in with existing trees and hedges together with good design and appropriate materials would offset much of the visual impact. It also notes that grade II Lower Creedy Bridge lies to the north. This was not previously identified in the SA, however it notes that the setting of Creedy Bridge does not appear to be compromised.</p>	<p>area. With mitigation through careful design of the access and landscaping to link with existing trees and hedges the 0/? post-mitigation score remains. The uncertain effect is due to the archaeological potential already identified in the SA.</p>
<p><b>Changes to the Plan</b></p>	
<p>A change the policy and supporting text is proposed to ensure design which respects the setting of the conservation area.</p>	

**Summary Matrix – NE1 Court Orchard, Newton St Cyres**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**Newton St Cyres Alternative Options**

**ONENEW New Estate Site A, Newton St Cyres**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<p>1. A representation was made during the Local Plan Review Proposed Submission consultation and submitted additional land which was argued to have <i>'no significant constraints and is</i></p>	<p>A full appraisal of the site has been undertaken which can be found in annex 3 with a summary matrix provided below. The site scores lower in comparison to the preferred site in Newton St Cyres in objective I)</p>

<i>immediately available and deliverable'.</i>	providing the necessary infrastructure. Of particular note are the concerns around access and safety with the highways authority recommending this site be rejected on those grounds. The site is therefore not preferred.
<b>Changes to the Plan</b>	
No changes are proposed to the Plan. The site is not preferred with particular issues around access and safety with the highways authority recommending this site be rejected on those grounds.	

**Summary Matrix – ONENEW New Estate Site A, Newton St Cyres**

	Alternative
Sustainability Objective	ONENEW New Estate Site A
A	0
B	0/?
C	+2/?
D	-2
E	0
F	0
G	+2
H	0
I	-2/?

**ONENEW New Estate Site B, Newton St Cyres**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
1. A representation was made during the Local Plan Review Proposed Submission consultation and submitted additional land which was argued to have <i>'no significant constraints and is immediately available and deliverable'</i> .	A full appraisal of the site has been undertaken which can be found in annex 3 with a summary matrix provided below. The site scores lower in objective A) protection of the natural environment and objective I) providing the necessary infrastructure in comparison to the preferred site in Newton St Cyres. Of particular note are the concerns around access and safety with the highways authority recommending this site be rejected on those grounds. The site is therefore not preferred.
<b>Changes to the Plan</b>	
No changes are proposed to the Plan. The site is not preferred with particular issues around access and safety with the highways authority recommending this site be rejected on those grounds.	



**Summary Matrix – ONENEW New Estate Site B, Newton St Cyres**

	Alternative
Sustainability Objective	ONENEW New Estate Site B
A	-1
B	0/?
C	+2/?
D	-2
E	0
F	0
G	+2
H	0
I	-2/?

**Sampford Peverell**

**SP1 Former Tiverton Parkway Hotel, Sampford Peverell**

No comments under SP1 are considered to give rise to alternatives to be considered in this annex.

**OSP1 Higher Town, Sampford Peverell (Proposed for allocation SP2)**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
1. National planning policy acknowledges the importance of ensuring housing numbers and employment opportunities are considered	In comparison to the alternative considered during the Local Plan Review Proposed Submission (2015) this alternative scores more

<p>in tandem. In response to this full Council on 22<sup>nd</sup> September 2016 resolved to allocate land at Higher Town for residential development of 60 dwellings. The policy has been amended to reflect the latest evidence and has been reappraised taking these findings into account. A full appraisal has been provided in Annex 3 and a summary matrix is provided below.</p>	<p>positively or the same in all aspects. The new appraisal takes into account new information in which there has been confirmation that access is achievable. Criteria have been included in the policy to ensure landscaping and design respects the setting and character of the area, conservation area and listed building. These elements were already noted in the proposed submission SA as such most of the scores remain the same.</p>
<p><b>New Information</b></p>	
<p>2. Since the Proposed Submission Sustainability Appraisal there has been confirmation that access is achievable and therefore the uncertainty has been removed.</p>	<p>This new information removes the uncertainty previously attached to objective I) delivering the necessary infrastructure and the score is now proposed to be neutral.</p>
<p>3. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA identifies that the site is adjacent to Sampford Peverell Conservation Area to North East. The site occupies an area enclosed in the medieval period and archaeological remains associated with the earlier field system and archaeological remnants may be affected by development here.</p>	<p>The SA recognises the impacts identified in the HEA and provision in the policy is provided to ensure mitigation.</p>
<p><b>Changes to the Plan</b></p>	
<p>A change to the Plan is proposed to include SP2 Higher Town allocation.</p>	

**Summary Matrix – OSP1 Higher Town, Sampford Peverell**

	Preferred	Alternative
Sustainability Objective	Higher Town with new information	Higher Town Proposed Submission
A	0	0
B	0/?	0/?
C	+2	+2
D	-2	-2
E	0	0
F	0	0
G	+2	+2
H	0	0
I	0	-1/?

**Sandford**

**SA1 Fanny’s Lane, Sandford**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<b>New Information</b>	
1. A representation was made during the Local Plan Review Proposed Submission consultation and commented that a <i>‘Historic environment appraisal is required to assess impact of development</i>	A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and

<p><i>on listed church and conservation area, if concludes harm to set out mitigation, and if harm remains need to justify public benefits’.</i></p>	<p>suggests mitigation where appropriate. It identifies the same elements in the SA and suggests the same recommendation for mitigation to ensure a buffer strip of open space or planting to protect the setting of the listed Park House and Sandford Conservation area. Good design is also recommended to avoid the domination of views and to retain the setting of the historic core of the church in particular which already forms a criterion in policy. Therefore no change is proposed to the SA or the Plan.</p>
<p><b>Changes to the Plan</b></p>	
<p>No changes to the Plan are proposed.</p>	

**Summary Matrix – SA1 Fanny’s Lane, Sandford**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**Silverton**

**SI1 Land at Old Butterleigh Road, Silverton**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<p><b>New Information</b></p>	
<p>1. A representation was made during the Local Plan Review Proposed Submission consultation and commented that they ‘<i>Object as development would lead to loss of old Devon hedge and/or destroy historically important part of village’.</i></p>	<p>A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA does not identify the elements raised in the representation and notes that there is no anticipated heritage impact. No change to the SA is proposed.</p>

<b>Changes to the Plan</b>
No changes to the Plan are proposed.

**Summary Matrix – SI1 Land at Old Butterleigh Road, Silverton**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**SI2 The Garage, Silverton**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<b>New Information</b>	
1. A Historic Environment Appraisal (HEA) has been undertaken which seeks to bring together information about the historic environment. It assesses the significance and harm of potential development and suggests mitigation where appropriate. The HEA notes that the site is no longer in the conservation area (following a 2015 revision) but now lies to the south west of the boundary. It also notes that ‘Channons’ in close proximity is likely to become a locally listed heritage asset. The HEA overall states that there is no anticipated heritage impact.	Given the new information set out in the HEA the pre-mitigation score is proposed to change from a negative (-2) to a slight negative (-1) score for objective B. A post-mitigation slight negative (-1) score remains due to the location of the site divorced from the main body of the village as discussed in the proposed submission SA.
<b>Changes to the Plan</b>	
No changes to the Plan are proposed.	

**Summary Matrix – SI2 The Garage, Silverton**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

## Thorverton

### TH1 South of Broadlands, Thorverton

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<p>1. Alternative for 1.15 ha and 20 dwellings.</p> <p>A representation was made during the Local Plan Review Proposed Submission consultation which suggested that the <i>'site area should be extended to incorporate allotment land, which could be provided elsewhere (subject to demand); could increase housing provision, make use of existing access and omit need for road widening/footpath creation and loss of hedgerow'</i>.</p> <p>In response to this representation an alternative of 1.15 ha including the allotment land to the west for a total of 20 dwellings has been considered.</p>	<p>The pre-mitigation score for this alternative scores lower in objective H) ensuring community health and wellbeing due to the loss of allotments, and I) delivering the necessary infrastructure due to a need for the road to be built to an adoptable standard and the access road would need to go through garages currently near the site. The issues identified could be mitigated in which this site scores almost identically to the proposed submission site, however there is greater uncertainty in this mitigation. If the relocation of the allotments is provided for this would result in a +1/? post-mitigation score for objective H). This is uncertain given that the site for the relocation of the allotments has not been indicated. If road improvements were made the issues identified in objective I) could be mitigated however this is uncertain given that this requires the garages are in control of the applicant, given the garages are not in control of the applicant an uncertain effect remains. Furthermore the mitigation required is much greater than the preferred policy which could make this option prohibitive.</p>
<b>Changes to the Plan</b>	
Alternative 1 is not preferred. Although this site scores an identical post mitigation score as the preferred site, greater mitigation would be required to enable this alternative to be acceptable and there is greater uncertainty in the delivery of this site. The option to avoid the	

relocation of allotments is preferable and the mitigation required for the road improvements has the potential to make this option prohibitive when compared with the proposed access set out in the preferred approach. The mitigation for the road improvements for the alternative option would also need the garages to be in control of the applicant, which they are currently not.

**Summary Matrix –TH1 South of Broadlands, Thorverton**

	Preferred	Alternative
Sustainability Objective	TH1 Proposed Submission Policy	TH1 including allotment land
A	0	0
B	0/?	0/?
C	0	0
D	-2	-2
E	0	0
F	0	0
G	+1	+2
H	+1	+1/?
I	0	0/?

**Thorverton Alternative Options**

**OTHNEW Land north east of Silver Street, Thorverton**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
1. A representation was made during the Local Plan Review	A full appraisal of the site has been undertaken which can be found in

<p>Proposed Submission consultation and submitted additional land which was argued to have <i>'no significant constraints and is immediately available and deliverable'</i>.</p>	<p>annex 3 with a summary matrix provided below. The site scores similarly to the preferred site. It scores slightly more positively on objective c) mitigating the effects of climate change and slightly less positively on objective h) ensuring community health and well-being. Although there does not appear to be significant sustainability issues with this site individually, the cumulative impact of allocating this site in addition to the site preferred in the Local Plan Review could lead to overcapacity issues in the local schools.</p>
<p><b>Changes to the Plan</b></p>	
<p>No changes are proposed to the Plan. The Local Plan Review allocates sufficient land for residential development to meet the district's housing need. The addition of this site in Thorverton could lead to a negative cumulative impact on the capacity of local schools.</p>	

**Summary Matrix – OTHNEW land north east of Silver Street, Thorverton**

	Alternative
Sustainability Objective	OTHNEW Land NE Silver Street
A	0
B	0
C	+1
D	-2
E	0
F	0
G	+1
H	0



I	0
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**OTHNEW Land to the west of Lynch Close and Cleaves Close, Thorverton**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
<p>1. A representation was made during the Local Plan Review Proposed Submission consultation and submitted additional land which was argued to have <i>'no significant constraints and is immediately available and deliverable'</i>.</p>	<p>A full appraisal of the site has been undertaken which can be found in annex 3 with a summary matrix provided below. The site scores similarly to the preferred site. It scores slightly more positively on objective g) meeting housing needs and slightly less positively on objective h) ensuring community health and well-being. The site proposes more housing development than other options in Thorverton, as such it may not be possible to accommodate the number of pupils arising from the development in the existing school and developer contributions would be required for expansion. Although there are opportunities for mitigation the impact on the adjoining grade II listed building may be a constraint for the site.</p>
<p><b>Changes to the Plan</b></p>	
<p>No changes are proposed to the Plan. The Local Plan Review allocates sufficient land for residential development to meet the district's housing need. The site is less preferred given the potential impact on the capacity of the primary school and the impact on the listed building adjoining, although it is noted there are options for mitigation.</p>	

**Summary Matrix – OTHNEW Land to the west of Lynch Close and Cleaves Close, Thorverton**

	Alternative
Sustainability Objective	OTHNEW Land to W of Lynch Close and Cleaves Close
A	0
B	0/?
C	+1
D	-2
E	0
F	0
G	+2
H	0
I	0

**Uffculme Alternative Options**

**OUF3 – Land west of Uffculme**

<b>Reasonable Alternative Proposed</b>	<b>Impact on the Sustainability Appraisal</b>
1. Land with a gross site area of 3.49 (ha) for 60 dwellings, 35% affordable.	The site has been reappraised given the conclusions of the inspectors report. A full appraisal can be found in Annex 3. The site scores more

<p>This alternative has been considered following an appeal decision in February 2016 allowing outline planning permission for a site of 3.49ha with 60 dwellings.</p>	<p>positively to the Proposed Submission SA appraisal in post-mitigation scores in objective b) built and historic environment; taking into account the inspectors comments a neutral effect is considered rather than a negative effect. It also scores more positively in objective h) Ensuring community health and wellbeing taking into account the Inspector's comments. A neutral rather than a slight negative effect is considered.</p>
<p><b>Sustainability Appraisal Comments</b></p>	
<p>1. A representation was made during the Local Plan Review Proposed Submission consultation and commented on objective B) protection and promotion of a quality built and historic environment. <i>'Recent application refused but consultation response from Devon County Council [on archaeology] advises imposition of a condition. Therefore this [archaeology] is not an issue that strikes at the principle of development of the site'.</i> Messrs Persey and Harding c/o Jillings-Hutton (4654)</p>	<p>The condition requested refers to archaeological considerations. This has been reflected in the post-mitigation score for objective B. The score for objective B considers various elements related to the built and historic environment including but not limited to archaeology. No change is proposed with regard to the comment on archaeology however it should be noted that for objective B) built and historic environment, in taking into account the inspectors comments as discussed in alternative 1 a neutral effect is considered rather than a negative effect. A full appraisal is provided in annex 3 and summary matrix is provided below.</p>
<p>2. A representation was made during the Local Plan Review Proposed Submission consultation and commented on objective C) mitigating the effects of climate change. <i>'Recent application refused but consultation response from Environment Agency highlights no objection. None of proposed housing within application was on flood zone 2 or 3'.</i> Messrs Persey and Harding c/o Jillings-Hutton (4654)</p>	<p>The scoring when considering flood zones is set out on page 193 of the Proposed Submission SA. The SA aims to apply a consistent approach to scoring across the various sites proposed in Mid Devon. In this case some areas of the site fell within in areas of flood zone 2 and 3 and therefore initially scored slightly lower than other sites which did not include any areas of flood zone 2 or 3. However the site was redrawn to exclude areas in flood zone 2 or 3. This was reflected</p>

	in the post-mitigation score for objective C 'mitigating the effects of climate change'. No change is proposed with regard to the comment in alternative 2.
<p>3. A representation was made during the Local Plan Review Proposed Submission consultation and commented on objective H) ensuring community health and wellbeing. <i>'Disagree that a walk to school of around a mile is adverse. Site is not preferred in SA as would lead to long walking distances to village facilities'</i>. Messrs Persey and Harding c/o Jillings-Hutton (4654)</p>	<p>As noted by the commentary of the SA it is considered that the location of the site is approximately 1 mile to the primary school which could restrict young children walking to school. The Institute for Highways and Transportation Guidelines for 'acceptable' walking distances, state that for education up to 500m is the preferred distance and up to 1km is an acceptable distance. The nearest edge of the proposed site to the school is almost 1.5km to the primary school. Therefore at the time of appraising the site it was considered appropriate that a slight negative effect is considered in relation to this objective. However the site has been reappraised following the 2016 appeal decision, in which the Inspector stated that in his view the appeal site was within an acceptable and safe walking distance of the village services and facilities. As such overall a neutral effect rather than slight negative effect is considered for objective H) ensuring community health and wellbeing.</p>
<b>Changes to the Plan</b>	
A change to the Plan is proposed to allocate the site as set out in the appeal decision discussed in alternative 1.	

**Summary Matrix – OUF3 Land west of Uffculme**

	Alternative	Preferred
Sustainability Objective	Proposed Submission SA	3.49ha, 60 dwellings
A	0	0
B	-2/?	0/?
C	+1	+1
D	-1	-1
E	0	0
F	0	0
G	+1	+1
H	-1	0
I	0	0

**Willand**

**W11 Land east of M5, Willand**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<p>1. Alternative of 14.8ha of 174 dwellings.                      A representation was made during the Local Plan Review Proposed Submission consultation which suggested that the <i>'allocation should be increased to 174 dwellings - is stated to be suitable, available and deliverable with no technical or</i></p>	<p>A full appraisal is provided in annex 3 and a summary matrix is provided below. The proposed alternative scores lower overall on objectives A) protection of the natural environment, D) safeguarding and minimising resource use and H) ensuring community health and wellbeing. The alternative scores more positively on objectives E)</p>

<p><i>landownership constraints; represents 'infill' between M5 and remainder of village; appropriate buffer zone and planting, as well as protection of habitats would be required'</i></p> <p>In response to this representation, the site area proposed in the submission was used to determine the area of the site and an alternative allocation of 14.8ha of 174 dwellings has been considered.</p>	<p>promoting economic growth and employment and G) meeting housing needs.</p>
<p><b>Changes to the Plan</b></p>	
<p>Alternative 1 is not preferred, although there are some benefits to this alternative in terms of meeting housing needs and a slight positive impact on promoting economic growth and employment, the scale of development results in a greater negative scores on a number of objectives and in terms of a strategic preferred approach, development of this scale in the villages would not reflect a sustainable pattern of distribution in accordance with the NPPF. The cumulative impacts in rural areas are also heightened particularly when large scale development is proposed in villages for example on the road infrastructure or primary school capacity.</p>	

**Summary Matrix – W11 Land east of M5, Willand**

	Preferred	Alternative
Sustainability Objective	Proposed Submission Policy	14.8ha, 174 dwellings
A	0	-1
B	0	0
C	+1	+1
D	-1	-2
E	0	+1
F	0	0
G	+2	+3
H	+1	0
I	0/?	0/?

**W12 Willand Industrial Estate**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<p>1. Full allocation of 9.2ha 22,000 sqm of commercial floorspace. A representation was made during the Local Plan Review Proposed Submission consultation and noted that <i>‘proposed deletion of remainder of phase 1 commercial is premature, removal of phase 2 is understood, though the site may be used to relocate a nearby business’</i>.</p>	<p>This alternative scores slightly less positively on objective A) protection of the natural environment as it is a larger site abutting the M5 and therefore will be more visible. However it scores higher in objective E) promoting economic growth and employment as it provides more commercial floorspace. An error was found in the assessment for the preferred site in the Proposed Submission SA</p>

<p>In response to this representation the original allocation has been reconsidered. The Proposed Submission SA did not provide a full site appraisal for the full allocation given the preferred allocation formed part of the original site. Therefore in reconsidering this alternative a summary matrix is provided below with full appraisal provided in annex 3.</p>	<p>where the 2.2ha site proposed for 8,800 should have scored a +2 not +3 as set out in the appraisal guidance p.192 of the SA. A summary matrix is provided below.</p>
<p>2. Allocation as residential development.  Representations were made during the Local Plan Review Proposed Submission consultation which suggested the site would be appropriate for residential development.  In response to these representations an alternative of W12 Willand Industrial Estate allocated as a residential development has been considered for 53 dwellings</p>	<p>This alternative would result in a less positive scores in in objective B) protection and promotion of the built and historic environment, E) promoting economic growth and employment and H) ensuring community health and wellbeing. The alternative scores more positively on objective G) meeting housing needs. A full appraisal is provided in annex 3 and summary matrix is provided below.</p>
<p><b>Changes to the Plan</b></p>	
<p>Alternative 1 is a proposed as a modification to the plan. The Council’s original reasons for not allocating the full site have been addressed as the remainder of the site is now deliverable, with access to Phase 2 having been secured. The viability of delivering employment units in this location, which was another of the Council’s concerns, is addressed by information provided as part of the proposed submission consultation. A planning application has also been submitted covering the entirety of phase 2. Given the likely development of the site and the benefit of providing additional commercial floorspace on objective E) promoting economic growth and employment it is considered beneficial to allocate the full site. Alternative 2 is not preferred. The site is not suitable for residential development, being surrounded on three sides by existing and forthcoming employment development.</p>	



**Summary Matrix –W12 Willand Industrial Estate**

	Preferred	Alternative	
Sustainability Objective	Options site 10.4ha, 21,840sqm commercial	Proposed submission site 2.2ha, 8,800sqm commercial	Alternative of 2.2ha as residential development
A	-1	0	0
B	+1/?	+1/?	-2/?
C	+1	+1	+1
D	0	0	0
E	+3	+2	0
F	0	0	0
G	0	0	+2
H	0	0	-2
I	0	0	0

## **Managing Development**

### **DM1 High quality design**

No comments under DM1 are considered to give rise to alternatives to be considered in this annex.

### **DM2 Renewable and low carbon energy**

No comments under DM2 are considered to give rise to alternatives to be considered in this annex.

### **DM3 Transport and air quality**

No comments under DM3 are considered to give rise to alternatives to be considered in this annex.

### **DM4 Pollution**

No comments under DM4 are considered to give rise to alternatives to be considered in this annex.

### **DM5 Parking**

No comments under DM5 are considered to give rise to alternatives to be considered in this annex.

### **DM6 Rural exceptions sites**

No comments under DM6 are considered to give rise to alternatives to be considered in this annex.

### **DM7 Gypsy and traveller accommodation**

No comments under DM7 are considered to give rise to alternatives to be considered in this annex.

### **DM8 Rural workers' dwellings**

No comments under DM8 are considered to give rise to alternatives to be considered in this annex.

### **DM9 Conversion of rural buildings**

No comments under DM9 are considered to give rise to alternatives to be considered in this annex.

### **DM10 Replacement dwellings in rural areas**

No comments under DM10 are considered to give rise to alternatives to be considered in this annex.

### **DM11 Residential extensions and ancillary development**

No comments under DM11 are considered to give rise to alternatives to be considered in this annex.

### **DM12 Design of housing**

No comments under DM12 are considered to give rise to alternatives to be considered in this annex.

### **DM13 Dwelling sizes**

No comments under DM13 are considered to give rise to alternatives to be considered in this annex.

### **DM14 Town centre development**

No comments under DM14 are considered to give rise to alternatives to be considered in this annex.

### **DM15 Development outside town centres**

No comments under DM15 are considered to give rise to alternatives to be considered in this annex.

### **DM16 Fronts of shops and business premises**

No comments under DM16 are considered to give rise to alternatives to be considered in this annex.

### **DM17 Rural shopping**

No comments under DM17 are considered to give rise to alternatives to be considered in this annex.

**DM18 Rural employment development**

No comments under DM18 are considered to give rise to alternatives to be considered in this annex.

**DM19 Protection of employment land**

No comments under DM19 are considered to give rise to alternatives to be considered in this annex.

**DM20 Agricultural development**

No comments under DM20 are considered to give rise to alternatives to be considered in this annex.

**DM21 Equestrian development**

No comments under DM21 are considered to give rise to alternatives to be considered in this annex.

**DM22 Tourism and leisure development**

No comments under DM22 are considered to give rise to alternatives to be considered in this annex.

**DM23 Community Facilities**

No comments under DM23 are considered to give rise to alternatives to be considered in this annex.

**DM24 Protection of Local Green Space and recreational land/buildings**

No comments under DM24 are considered to give rise to alternatives to be considered in this annex.

**DM25 Development affecting heritage assets**

No comments under DM25 are considered to give rise to alternatives to be considered in this annex.

**DM26 Green infrastructure in major development**

No comments under DM26 are considered to give rise to alternatives to be considered in this annex.

**DM27 Protected landscapes**

No comments under DM27 are considered to give rise to alternatives to be considered in this annex.

**DM28 Other protected sites**

Reasonable Alternative Proposed	Impact on the Sustainability Appraisal
<p>1. A representation was made during the Local Plan Review Proposed Submission consultation and noted that <i>'DM28 SA should include compensatory measures as part of policy.'</i></p> <p>Environment Agency (943)</p>	<p>This comment was made on the SA however the comment is more relevant to a change to the policy within the Plan rather than the SA. Compensation would result in a neutral effect on the environment in which the proposed alternative would not result in any change to scoring of the SA.</p>
<p><b>Changes to the Plan</b></p>	
<p>Although the proposed change would not impact on the SA score it is considered that the comment is beneficial and an amendment to the policy is proposed to set out that compensatory measures in some cases may be considered appropriate where mitigation measures are not possible.</p>	

**Summary Matrix – DM28 Other protected sites**

None of the alternatives are considered to give rise to any change to the post-mitigation SA scoring.

**DM29 Enforcement**

No comments under DM29 are considered to give rise to alternatives to be considered in this annex.

### **Miscellaneous**

Sport England provided a response as part of the Local Plan Review Proposed Submission Consultation (2015) in which they suggested an alternative to the following policies to reflect Active Design principles and implementation:

- S1 Sustainable Development priorities
- S9 Environment
- TIV1 Eastern Urban Extension
- TIV6 Farleigh Meadows
- CU1 NW Cullompton
- CU7 East Cullompton
- DM1 High Quality Design
- DM12 Design of Housing

It is considered that the relevant principles are already generally reflected in the plan policies, for example S1, S5 and DM1. Reference to all active design principles in the policies above would be unnecessary and out of context and therefore is not preferred. This has not been appraised as it is considered the active design principles are already incorporated and would not overall amend the sustainability of the Local Plan.

## **Annex 3 Additional Reasonable Alternative Appraisals**

This annex sets out the full appraisals undertaken as part of this Sustainability Appraisal update.

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## Strategic Policies

### Additional Appraisals for S2 Amount and Distribution of development

#### *Preferred Option S2: Amount of Residential Development - Meet Housing Need with Junction 27 additional housing requirements (7,860 dwellings)*

This option for the amount of residential development is to meet the objectively assessed housing needs over the plan period following the latest SHMA figure which identifies a need of 7600 dwellings rather than the 7200 as previously indicated in the proposed submission document. It also provides for the additional housing in response to the employment allocation at Junction 27 which is a preferred policy option in this Local Plan Review. The sustainability of the 7860 alternative is considered to fall between alternatives 7600 and 8000 which are assessed below. However the proposed change to the housing amount is not considered significant enough to enable a meaningful comparison; as such it is considered that the alternative of 7860 will score the same as the option to meet the objectively assessed housing need of 7600. A full appraisal is provided below for completeness.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	This is a housing target set at a level to meet the objectively assessed need of Mid Devon with two additional sites in response to the housing requirements of allocating the Junction 27 commercial option. It is capable of being met without negatively impacting significantly on the existing environmental limits of the districts towns and villages. The SHLAA has identified a sufficient number of alternative sites to avoid adverse environmental impact. The level of impact on this objective will be dependent on individual proposals but is considered to be neutral in this scenario.	0	The policy should be considered in the context of other policies which aim to protect the natural environment and ensure that the most valued landscapes and designated biodiversity and geodiversity sites are conserved.	0



<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
B) Protection and promotion of a quality built and historic environment	This approach will have some positive and some negative impacts in contributing to this objective depending on each individual proposal.	0	The policy should be considered in the context of other policies which aim to protect heritage assets and which promote high quality design which supports the positive contribution of new development to local character.	0
C) Mitigating the effects of climate change	The construction of new homes and catering for a greater population can increase carbon emissions; however there may be opportunities by meeting housing needs to enhance features such as walking and cycling provision for the community as a whole. Opportunities to reduce flood risk; promote low carbon or renewable energy and create low carbon buildings also arise. This option may have some positive and some negative impacts in contributing to this objective depending on each individual proposal.	0	The policy should be considered in the context of other policies such as sustainable design.	0
D) Safeguarding and minimising resource use	A housing target set at a level to meet the objectively assessed need of Mid Devon with the additional housing required in response to the allocation of Junction 27 is capable of being met while still safeguarding and minimising resource use. The SHLAA has identified some alternative sites on brownfield land but will still require the loss of some of the highest grades of agricultural land if development is	-2	This policy should be read in the context of other policies in the plan, for example sustainable design. A negative effect is anticipated post mitigation.	-2

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
	directed towards the towns. The level of impact on this objective will be dependent on individual proposals but is considered to be negative in this scenario.			
E) Promoting economic growth and employment	An increase in residential development would benefit the local economy and increase the number of local people to the working pool. A positive impact.	+1		+1
F) Supporting retail	This policy will have a positive contribution towards achieving this objective as an increase in population would increase the number of shoppers in the District and contribute towards enhancing shopping areas in Town Centres.	+1		+1
G) Meeting housing needs	This policy will have a significant positive contribution towards achieving this objective. The key purpose of this policy is to meet the housing needs of the district. The policy meets the objectively assessed housing needs target of 7,600 as well as the additional housing requirement in response to the proposed allocation at Junction 27. It also promotes balanced communities by encouraging an appropriate mix of housing such as affordable housing, housing designed for the elderly and gypsy and traveller pitches.	+3	This option should also be read in the context of other policies in the plan which aim to meet the demand for services and facilities of the community.	+3
H) Ensuring community health and wellbeing	The policy helps to reduce barriers to housing by meeting the diverse housing needs of the district and is therefore likely to have at least a minor positive contribution to this objective. The option does not however proactively aim to meet the variety of indices in this option.	+1	The option should however be read in the context of other policies which support community health and	+1

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	The impact on the provision of open space, limiting air, noise and light pollution and promoting safe and secure environments is unknown.		wellbeing.	
l) Delivering the necessary infrastructure	A housing target set at a level to meet the objectively assessed need of Mid Devon with the additional housing requirement in response to the Junction 27 option is capable of being met without negatively impacting on the delivery of necessary infrastructure. The two additional sites at Blundells School, Tiverton and Higher Town, Sampford Peverell are able to provide the infrastructure required in-step with development. Transport evidence confirms a new junction onto the M5 at Cullompton is technically feasible and that infrastructure requirements can be met. This policy approach could have some positive or some negative impacts on delivering the necessary infrastructure. The level of impact will be on a site by site basis.	0	The policy should be read in the context of other policies which aim to deliver the necessary infrastructure. Any proposals will also have to abide to the infrastructure policy in the plan.	0

Secondary/cumulative/synergistic effects:	A Habitat Regulations Assessment of the Mid Devon Local Plan Review including Junction 27 has been undertaken which concludes that the J27 site allocation, alone or in combination with the Local Plan proposals, will not have an adverse effect on the integrity of the Culm Grasslands SAC.
Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Construction will occur over the lifetime of the Plan up to 2033. Once completed the effect will be permanent.
Spatial extent: (District wide / local)	Policy option aims to meet the housing needs across the district.

**Alternative Option S2: Amount of Residential Development - Meet Housing Need (7,600 dwellings)**

This option for the amount of residential development is to meet the objectively assessed housing needs over the plan period following the latest SHMA figure which identifies a need of 7600 dwellings rather than the 7200 as previously indicated in the proposed submission document.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	This housing target is set at a level to meet the objectively assessed need of Mid Devon is capable of being met without negatively impacting on the existing environmental limits of the districts towns and villages. The SHLAA has identified a sufficient number of alternative sites to avoid adverse environmental impact. The level of impact on this objective will be dependent on individual proposals but is considered to be neutral in this scenario.	0	The policy should however be considered in the context of other policies which aim to protect the natural environment and ensure that the most valued landscapes and designated biodiversity and geodiversity sites are conserved.	0
B) Protection and promotion of a quality built and historic environment	This approach will have some positive and some negative impacts in contributing to this objective depending on each individual proposal.	0	The policy should be considered in the context of other policies which aim to protect heritage assets and which promote high quality design which supports the positive contribution of new development to local character.	0

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
C) Mitigating the effects of climate change	The construction of new homes and catering for a greater population can increase carbon emissions; however there may be opportunities by meeting housing needs to enhance features such as walking and cycling provision for the community as a whole. Opportunities to reduce flood risk; promote low carbon or renewable energy and create low carbon buildings also arise. This option may have some positive and some negative impacts in contributing to this objective depending on each individual proposal.	0	The policy should be considered in the context of other policies such as sustainable design.	0
D) Safeguarding and minimising resource use	A housing target set at a level to meet the objectively assessed need of Mid Devon is capable of being met while still safeguarding and minimising resource use. The SHLAA has identified some alternative sites on brownfield land but will still require the loss of some of the highest grades of agricultural land if development is directed towards the towns. The level of impact on this objective will be dependent on individual proposals but is considered to be negative in this scenario.	-2	This policy should be read in the context of other policies in the plan, for example sustainable design. A negative effect is anticipated post mitigation.	-2
E) Promoting economic growth and employment	An increase in residential development would benefit the local economy and increase the number of local people to the working pool. A positive impact.	+1		+1
F) Supporting retail	This policy will have a positive contribution towards achieving this objective as an increase in population would increase the number of shoppers in the District and contribute towards enhancing shopping areas in Town Centres.	+1		+1

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
G) Meeting housing needs	This policy will have a significant positive contribution towards achieving this objective. The key purpose of this policy is to meet the housing needs of the district. The policy meets the objectively assessed housing needs target of 7,600 and promotes balanced communities by encouraging an appropriate mix of housing such as affordable housing, housing designed for the elderly and gypsy and traveller pitches.	+3	This option should also be read in the context of other policies in the plan which aim to meet the demand for services and facilities of the community.	+3
H) Ensuring community health and wellbeing	The policy helps to reduce barriers to housing by meeting the diverse housing needs of the district and is therefore likely to have at least a minor positive contribution to this objective. The option does not however proactively aim to meet the variety of indices in this option. The impact on the provision of open space, limiting air, noise and light pollution and promoting safe and secure environments is unknown.	+1	The option should however be read in the context of other policies which support community health and wellbeing.	+1
I) Delivering the necessary infrastructure	A housing target set at a level to meet the objectively assessed need of Mid Devon is capable of being met without negatively impacting on the delivery of necessary infrastructure. Transport evidence confirms a new junction onto the M5 at Cullompton is technically feasible and that infrastructure requirements can be met. This policy approach could have some positive or some negative impacts on delivering the necessary infrastructure. The level of impact will be on a site by site basis.	0	The policy should be read in the context of other policies which aim to deliver the necessary infrastructure. Any proposals will also have to abide to the infrastructure policy in the plan.	0

Secondary/cumulative/synergistic effects:	A Habitat Regulations Assessment of the Mid Devon Local Plan Review including Junction 27 has been undertaken which concludes that the J27 site allocation, alone or in combination with the Local Plan proposals, will not have an adverse effect on the integrity of the Culm Grasslands SAC. As such a policy option which has less development proposed is considered reach the similar conclusions.
Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Construction will occur over the lifetime of the Plan up to 2033. Once completed the effect will be permanent.
Spatial extent: (District wide / local)	Policy option aims to meet the housing needs across the district.

**Alternative Option S2: Amount of residential development - Lower growth scenario (7,200 dwellings).**

The development needs of the community will be met through the provision of approximately 7,200 dwellings between 1 April 2013 and 31 March 2033. This would be a slightly lower growth scenario than the 7,600 figure to meet the objectively assessed housing needs as indicated in the SHMA. This figure was originally published before the final figures of the SHMA were set. As such the SA has been amended to reflect the deficit of 400 dwellings over the plan period to meet the objectively assessed housing need of Mid Devon when pursuing this scenario.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	A housing target set at a level slightly lower than the objectively assessed need of Mid Devon is capable of being met without negatively impacting on the existing environmental limits of the districts towns and villages. The SHLAA has identified a sufficient number of alternative sites to avoid adverse environmental impact. The level of impact on this objective will be dependent on individual proposals but is considered to be neutral in this scenario.	0	The policy should however be considered in the context of other policies which aim to protect the natural environment and ensure that the most valued landscapes and designated biodiversity	0

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
			and geodiversity sites are conserved.	
B) Protection and promotion of a quality built and historic environment	This approach will have some positive and some negative impacts in contributing to this objective depending on each individual proposal.	0	The policy should be considered in the context of other policies which aim to protect heritage assets and which promote high quality design which supports the positive contribution of new development to local character.	0
C) Mitigating the effects of climate change	The construction of new homes and catering for a greater population can increase carbon emissions; however there may be opportunities by meeting housing needs to enhance features such as walking and cycling provision for the community as a whole. Opportunities to reduce flood risk; promote low carbon or renewable energy and create low carbon buildings also arise. This option may have some positive and some negative impacts in contributing to this objective depending on each individual proposal.	0	The policy should be considered in the context of other policies such as sustainable design.	0
D) Safeguarding and minimising resource use	This housing target is capable of being met while still safeguarding and minimising resource use. The SHLAA has identified some alternative sites on brownfield land but will still require the loss of some of the highest grades of agricultural land if development is	-2	This policy should be read in the context of other policies in the plan, for example sustainable design. A	-2



<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
	directed towards the towns. The level of impact on this objective will be dependent on individual proposals but is considered to be negative in this scenario.		negative effect is anticipated post mitigation.	
E) Promoting economic growth and employment	An increase in residential development would benefit the local economy and increase the number of local people to the working pool. A positive impact	+1		+1
F) Supporting retail	This policy will have a positive contribution towards achieving this objective as an increase in population would increase the number of shoppers in the District and contribute towards enhancing shopping areas in Town Centres.	+1		+1
G) Meeting housing needs	This policy will have a positive contribution towards achieving this objective. The policy meets a significant proportion of the housing needs of the district but not the whole need and therefore has a positive impact rather than significant positive impact. The housing needs target of 7,200 promotes balanced communities by encouraging an appropriate mix of housing such as affordable housing, housing designed for the elderly and gypsy and traveller pitches.	+2	This option should be read in the context of other policies in the plan which aim to meet the demand for services and facilities of the community.	+2
H) Ensuring community health and	Helps to reduce barriers to housing by meeting the diverse housing needs of the district and is therefore likely to have at least a minor positive contribution to this objective. The option does not however	+1	The option should however be read in the context of other policies which support	+1

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
wellbeing	proactively aim to meet the variety of indices in this option. The impact on the provision of open space, limiting air, noise and light pollution and promoting safe and secure environments is unknown.		community health and wellbeing.	
l) Delivering the necessary infrastructure	A housing target set at a level slightly lower than the required level to meet the objectively assessed need of Mid Devon is capable of being met without negatively impacting on the delivery of necessary infrastructure. Transport evidence confirms a new junction onto the M5 at Cullompton is technically feasible and that infrastructure requirements can be met. This policy approach could have some positive or some negative impacts on delivering the necessary infrastructure. The level of impact will be on a site by site basis.	0	The policy should read in the context of other policies which aim to deliver the necessary infrastructure. Any proposals will also have to abide to the infrastructure policy in the plan.	0

Secondary/cumulative/synergistic effects:	A Habitat Regulations Assessment of the Mid Devon Local Plan Review including Junction 27 has been undertaken which concludes that the J27 site allocation, alone or in combination with the Local Plan proposals, will not have an adverse effect on the integrity of the Culm Grasslands SAC. As such a policy option which has less development proposed is considered reach the similar conclusions.
Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Construction will occur over the lifetime of the Plan up to 2033. Once completed the effect will be permanent.
Spatial extent: (District wide / local)	Policy option aims to meet a significant proportion of the housing needs across the district.

**Alternative Option S2: Amount of residential development - Intermediate Higher Growth Scenario (8,000 dwellings).**

The development needs of the community will be met through the provision of approximately 8,000 dwellings between 1 April 2013 and 31 March 2033. This is a higher level of growth than is needed during the plan period and therefore would provide an additional 400 dwellings above the objectively assessed need.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	An intermediate 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. The intermediate higher growth would not necessarily result in the need to the strategic development to the east of Tiverton but would require greater development in the 3 main towns and/or villages, as such a slight negative effect is considered.	-1	The policy should however be considered in the context of other policies which aim to protect the natural environment and ensure that the most valued landscapes and designated biodiversity and geodiversity sites are conserved.	0
B) Protection and promotion of a quality built and historic environment	A intermediate higher growth scenario will have some positive and some negative impacts in contributing to this objective depending on each individual proposal.	0	The policy should be considered in the context of other policies which aim to protect heritage assets and which promote high quality design which supports the positive contribution of new development to local character.	0

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
C) Mitigating the effects of climate change	The construction of new homes and catering for a greater population can increase carbon emissions; however there may be opportunities by meeting housing needs to enhance features such as walking and cycling provision for the community as a whole. Opportunities to reduce flood risk; promote low carbon or renewable energy and create low carbon buildings also arise. Similar to the existing policy this option may have some positive and some negative impacts in contributing to this objective depending on each individual proposal.	0	The policy should be considered in the context of other policies such as sustainable design.	0
D) Safeguarding and minimising resource use	A intermediate higher growth scenario is likely to be more difficult to distribute between the towns while safeguarding and minimising resource use. Option is likely to put greater pressure on the supply of brownfield sites and therefore require further greenfield developments. Similarly there are areas of the highest grades of agricultural land around the towns of Tiverton and Cullompton. The level of impact on this objective will be dependent on individual proposals. Given the additional land required to provide for the additional housing a negative effect is considered.	-2	This policy should be read in the context of other policies in the plan, for example sustainable design. A negative effect is anticipated post mitigation.	-2
E) Promoting economic growth and employment	An increase in residential development would benefit the local economy and increase the number of local people to the working pool. A slight positive impact.	+1		+1
F) Supporting	This policy will have a positive contribution towards achieving this	+1		+1

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
retail	objective as an increase in population would increase the number of shoppers in the District and contribute towards enhancing shopping areas in Town Centres.			
G) Meeting housing needs	This policy will have a significant positive contribution towards achieving this objective. The key purpose of this policy is to meet the housing needs of the district. The policy meets the housing needs target of 7,600 and exceeds it by setting a target of 8,000 dwellings. The impact of this policy on existing services and facilities is unknown as this will be on a site by site basis. This approach is considered to have a significant positive impact on housing provision in the District.	+3	This option should be read in the context of other policies in the plan which aim to meet the demand for services and facilities of the community.	+3
H) Ensuring community health and wellbeing	The policy helps to reduce barriers to housing by meeting the diverse housing needs of the district and is therefore likely to have at least a minor positive contribution to this objective. The option does not however proactively aim to meet the variety of indices in this option. The impact on the provision of open space, limiting air, noise and light pollution and promoting safe and secure environments is unknown.	+1	The option should however be read in the context of other policies which support community health and wellbeing.	+1
I) Delivering the necessary infrastructure	An intermediate growth scenario is likely to be more difficult to distribute between the towns while delivering the necessary infrastructure. This policy approach could have some positive or some negative impacts on delivering the necessary infrastructure. The level of impact on this objective will be dependent on individual	-1	The policy should read in the context of other policies which aim to deliver the necessary infrastructure. Any proposals will also have to abide to the	-1

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	proposals but is considered to be a slight negative in this scenario.		infrastructure policy in the plan. A slight negative effect is anticipated post mitigation due to the difficulty of distributing development across the towns and villages whilst providing the necessary infrastructure in-step.	

Secondary/cumulative/synergistic effects:	There could be a cumulative impact of a higher growth scenario on delivering the necessary infrastructure. The impact of this policy option will be dependent on the scale and location of individual proposals. A Habitat Regulations Assessment of the Mid Devon Local Plan Review including Junction 27 has been undertaken which concludes that the J27 site allocation, alone or in combination with the Local Plan proposals, will not have an adverse effect on the integrity of the Culm Grasslands SAC. Given this option would be greater than that proposed in the preferred option an updated Habitat Regulations Assessment would be required to determine the cumulative impact on the integrity of European sites around Mid Devon.
Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Construction will occur over the lifetime of the Plan up to 2033. Once completed the effect will be permanent.
Spatial extent: (District wide / local)	Policy option aims to meet the housing needs across the district.

**Alternative Option S2: Amount of residential development - Higher Growth Scenario (8,400 dwellings).**

The development needs of the community will be met through the provision of approximately 8,400 dwellings between 1 April 2013 and 31 March 2033. This is a higher level of growth than is needed during the plan period and therefore would provide an additional 800 dwellings above the objectively assessed need.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	A higher growth scenario may 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 some landscape impact. The level of impact on this objective will be dependent on individual proposals but is considered to be negative in this scenario.	-2	The policy should however be considered in the context of other policies which aim to protect the natural environment and ensure that the most valued landscapes and designated biodiversity and geodiversity sites are conserved. A slight negative effect is still anticipated post mitigation given the higher growth scenario for this plan period.	-1
B) Protection and promotion of a quality built and historic	A higher growth scenario will have some positive and some negative impacts in contributing to this objective depending on each individual proposal.	0	The policy should be considered in the context of other policies which aim to protect heritage assets and which promote high quality	0

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
environment			design which supports the positive contribution of new development to local character.	
C) Mitigating the effects of climate change	The construction of new homes and catering for a greater population can increase carbon emissions; however there may be opportunities by meeting housing needs to enhance features such as walking and cycling provision for the community as a whole. Opportunities to reduce flood risk; promote low carbon or renewable energy and create low carbon buildings also arise. Similar to the existing policy this option may have some positive and some negative impacts in contributing to this objective depending on each individual proposal.	0	The policy should be considered in the context of other policies such as sustainable design.	0
D) Safeguarding and minimising resource use	A higher growth scenario may be more difficult to distribute between the towns while safeguarding and minimising resource use. Option is likely to put greater pressure on the supply of brownfield sites and therefore require further greenfield developments. Similarly there are areas of the highest grades of agricultural land around the towns of Tiverton and Cullompton. The level of impact on this objective will be dependent on individual proposals. Given the additional land required to provide for the additional housing a significant negative effect is considered.	-3	This policy should be read in the context of other policies in the plan, for example sustainable design. A significant negative effect is anticipated post mitigation.	-3
E) Promoting	An increase in residential development would benefit the local	+1		+1



<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
economic growth and employment	economy and increase the number of local people to the working pool. A slight positive impact.			
F) Supporting retail	This policy will have a positive contribution towards achieving this objective as an increase in population would increase the number of shoppers in the District and contribute towards enhancing shopping areas in Town Centres.	+1		+1
G) Meeting housing needs	This policy will have a significant positive contribution towards achieving this objective. The policy meets the housing needs target of 7,600 and exceeds it by setting a target of 8,400 dwellings. The impact of this policy on existing services and facilities is unknown as this will be on a site by site basis. This approach is considered to have a positive impact on housing provision in the District.	+3	This option should however be read in the context of other policies in the plan which aim to meet the demand for services and facilities of the community.	+3
H) Ensuring community health and wellbeing	The policy helps to reduce barriers to housing by meeting the diverse housing needs of the district and is therefore likely to have at least a minor positive contribution to this objective. The option does not however proactively aim to meet the variety of indices in this option. The impact on the provision of open space, limiting air, noise and light pollution and promoting safe and secure environments is unknown.	+1	The option should however be read in the context of other policies which support community health and wellbeing.	+1
I) Delivering the necessary infrastructure	A higher growth scenario is likely to be more difficult to distribute between the towns while delivering the necessary infrastructure. This policy approach could have some positive or some negative	-3	The policy should read in the context of other policies which aim to deliver the necessary	-2/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>impacts on delivering the necessary infrastructure. The level of impact on this objective will be dependent on individual proposals but is considered to be significantly negative in this scenario given that the additional development is of an equivalent scale to a strategic allocation which is likely to require significant additional infrastructure above that already committed in the Local Plan.</p>		<p>infrastructure. Any proposals will also have to abide to the infrastructure policy in the plan. A negative and uncertain effect is anticipated post mitigation given the potential for significant infrastructure required however the impact is uncertain as it would be dependent on the location of development and the nature of the infrastructure required. Given the level of development proposed a number of proposals in rural areas are likely to be required where they may be a number of smaller roads which may require upgrading. However the level of development in any one location may not be of the quantum to result in sufficient funding to enable</p>	

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			full mitigation as such a negative but uncertain impact is considered.	

Secondary/cumulative/synergistic effects:	There could be a cumulative impact of a higher growth scenario on delivering the necessary infrastructure. The impact of this policy option will be dependent on the scale and location of individual proposals. A Habitat Regulations Assessment of the Mid Devon Local Plan Review including Junction 27 has been undertaken which concludes that the J27 site allocation, alone or in combination with the Local Plan proposals, will not have an adverse effect on the integrity of the Culm Grasslands SAC. Given this option would be greater than that proposed in the preferred option an updated Habitat Regulations Assessment would be required to determine the cumulative impact on the integrity of European sites around Mid Devon.
Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Construction will occur over the lifetime of the Plan up to 2033. Once completed the effect will be permanent.
Spatial extent: (District wide / local)	Policy option aims to meet the housing needs across the district.

**Alternative Option S2: Amount of residential development - Elevated Higher Growth Scenario (8,800 dwellings).**

The development needs of the community will be met through the provision of approximately 8,800 dwellings between 1 April 2013 and 31 March 2033. This is a higher level of growth than is needed during the plan period and therefore would provide an additional 1200 dwellings above the objectively assessed need.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	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 some landscape impact. The level of impact on this objective will be dependent on individual proposals but is considered to be significantly negative in this scenario as it would result in additional development of an equivalent scale to a strategic allocation.	-3	The policy should however be considered in the context of other policies which aim to protect the natural environment and ensure that the most valued landscapes and designated biodiversity and geodiversity sites are conserved. A negative effect is still anticipated post mitigation given the higher growth scenario for this plan period.	-2
B) Protection and promotion of a quality built and historic environment	A higher growth scenario will have some positive and some negative impacts in contributing to this objective depending on each individual proposal.	0	The policy should be considered in the context of other policies which aim to protect heritage assets and which promote high quality design which supports the	0

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			positive contribution of new development to local character.	
C) Mitigating the effects of climate change	The construction of new homes and catering for a greater population can increase carbon emissions; however there may be opportunities by meeting housing needs to enhance features such as walking and cycling provision for the community as a whole. Opportunities to reduce flood risk; promote low carbon or renewable energy and create low carbon buildings also arise. Similar to the existing policy this option may have some positive and some negative impacts in contributing to this objective depending on each individual proposal.	0	The policy should be considered in the context of other policies such as sustainable design.	0
D) Safeguarding and minimising resource use	A higher growth scenario is likely to be more difficult to distribute between the towns while safeguarding and minimising resource use. Option is likely to put greater pressure on the supply of brownfield sites and therefore require further greenfield developments. Similarly there are areas of the highest grades of agricultural land around the towns of Tiverton and Cullompton. The level of impact on this objective will be dependent on individual proposals. Given the additional land required to provide for the additional housing a significant negative effect is considered.	-3	This policy should be read in the context of other policies in the plan, for example sustainable design. A significant negative effect is anticipated post mitigation.	-3
E) Promoting economic	An increase in residential development would benefit the local economy and increase the number of local people to the working	+1		+1

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
growth and employment	pool. A slight positive impact.			
F) Supporting retail	This policy will have a positive contribution towards achieving this objective as an increase in population would increase the number of shoppers in the District and contribute towards enhancing shopping areas in Town Centres.	+1		+1
G) Meeting housing needs	This policy will have a significant positive contribution towards achieving this objective. The key purpose of this policy is to meet the housing needs of the district. The policy meets the housing needs target of 7,600 and exceeds it by setting a target of 8,800 dwellings. The impact of this policy on existing services and facilities is unknown as this will be on a site by site basis. This approach is considered to have a positive impact on housing provision in the District.	+3	This option should be read in the context of other policies in the plan which aim to meet the demand for services and facilities of the community.	+3
H) Ensuring community health and wellbeing	The policy helps to reduce barriers to housing by meeting the diverse housing needs of the district and is therefore likely to have at least a minor positive contribution to this objective. The option does not however proactively aim to meet the variety of indices in this option. The impact on the provision of open space, limiting air, noise and light pollution and promoting safe and secure environments is unknown.	+1	The option should however be read in the context of other policies which support community health and wellbeing.	+1
I) Delivering the necessary	A higher growth scenario is likely to be more difficult to distribute between the towns while delivering the necessary infrastructure.	-3	The policy should read in the context of other policies which	-2/?

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
infrastructure	<p>This policy approach could have some positive or some negative impacts on delivering the necessary infrastructure. The level of impact on this objective will be dependent on individual proposals but is considered to be significantly negative in this scenario given that the additional development is of an equivalent scale to a strategic allocation which is likely to require significant additional infrastructure above that already committed in the Local Plan.</p>		<p>aim to deliver the necessary infrastructure. Any proposals will also have to abide to the infrastructure policy in the plan. A negative and uncertain effect is anticipated post mitigation given the potential for significant infrastructure required however the impact is uncertain as it would be dependent on the location of development and the nature of the infrastructure required. Given the level of development proposed a number of proposals in rural areas are likely to be required where they may be a number of smaller roads which may require upgrading. However the level of development in any one location may not be of the quantum to result in</p>	

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			sufficient funding to enable full mitigation as such a negative but uncertain impact is considered.	

Secondary/cumulative/synergistic effects:	There could be a cumulative impact of a higher growth scenario on delivering the necessary infrastructure. The impact of this policy option will be dependent on the scale and location of individual proposals. A Habitat Regulations Assessment of the Mid Devon Local Plan Review including Junction 27 has been undertaken which concludes that the J27 site allocation, alone or in combination with the Local Plan proposals, will not have an adverse effect on the integrity of the Culm Grasslands SAC. Given this option would be greater than that proposed in the preferred option an updated Habitat Regulations Assessment would be required to determine the cumulative impact on the integrity of European sites around Mid Devon.
Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Construction will occur over the lifetime of the Plan up to 2033. Once completed the effect will be permanent.
Spatial extent: (District wide / local)	Policy option aims to meet the housing needs across the district.



**Alternative Option S2: Distribution of development - Rural focussed.**

Option concentrates greater development in rural areas with some development in the three main towns. Development in rural areas would be allocated in settlements designated as villages under S13 of the Local Plan Review. The spread of development would be 30% in Tiverton, 21% at Cullompton, 10% in Crediton and the remaining 39% in rural areas. This alternative was raised by a representation at the proposed submission stage, as such it has been assessed as part of the SA as an alternative option.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	The strategy concentrates development in rural areas with some continued provision in the three main towns. The strategy is likely to impact the landscape and rural setting of villages with the level of development proposed. There may be opportunities for enhancement of landscape character and biodiversity, but this is likely to be on an individual site basis and would be recognised at the post-mitigation stage. As the level of development proposed could result in development disproportionate to the scale of a village in a rural setting and would as such lead to significant landscape impacts a significant negative effect is considered.	-3	The protection of the natural environment is justified in policies elsewhere in the plan and there may be some opportunities for enhancement of landscape character and biodiversity on an individual site basis. However as the development would be of a scale which the impact on the rural setting and landscape would not be avoidable in a number of cases a negative effect is considered.	-2
B) Protection and promotion of a quality	New development in towns and villages has the potential to have a negative impact on the historic environment located in and around these settlements. There may however be some opportunities for a	-3	The protection of the historic environment is justified in policies elsewhere in the plan	-2

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
built and historic environment	positive effect through enhancement of heritage assets and local distinctiveness, but this is likely to be on an individual site basis and will be assessed at the post-mitigation stage. In terms of the impact on villages there is likely to be a significant negative impact in which although some development proposed could be easily absorbed into a rural setting bringing benefits to a village, the level of development proposed is at a scale which would be disproportionate to the size of the villages identified in policy S13.		and some mitigation can be provided on a case-by-case basis in which heritage assets and local distinctiveness will be enhanced. However due to the scale of development over the lifetime of the plan is at a level disproportionate to the size of the villages identified in policy S13 a negative effect remains.	
C) Mitigating the effects of climate change	By focussing new build development in rural areas, this will increase the need to travel and therefore increase greenhouse gas emissions. There may be some opportunities for flood mitigation and promotion of low carbon and renewable energy measures, but this is likely to be on an individual site basis, for example through design and will be considered at the post-mitigation stage. As some development will still occur in the towns but a significant proportion will be delivered in villages a negative effect overall is considered.	-2	There would overall be a slight negative effect considered post mitigation given that there may be opportunities for some flood mitigation and promotion of low carbon and renewable energy measures however this remains uncertain as this will be dependent on individual applications. As a large proportion of development	-1/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			would be in villages but coupled with the fact that some development will remain in the towns and the potential for opportunities for climate change mitigation the impact is reduced and a slight negative effect is considered.	
D) Safeguarding and minimising resource use	The option scores negatively towards safeguarding and minimising resource use as it focuses new development in villages in which would likely result in the loss of greenfield development and loss of some of the best and most versatile agricultural land. The agricultural land classification of all available village allocations ranges from grade 1 to brownfield land. The majority of sites fall in the bracket of grade 3 agricultural land and therefore overall a negative effect is considered.	-2	Policy should be read in conjunction with other policies within the plan and Devon County Council Waste Plan including those that set out the waste hierarchy.	-2
E) Promoting economic growth and employment	This option will have a positive effect as it increases jobs and reduces out commuting by focusing commercial floorspace at existing main towns and settlements. The option also supports rural business by providing commercial floor space in villages. This option will help meet the employment needs of the district and enhance the economy in general while encouraging inward investment and future prosperity. The main towns have good connection to the	+2		+2

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
	strategic road network for storage and distribution uses.			
F) Supporting retail	Focusing development in the main towns and larger villages will support the vitality and viability of existing town centres and shopping facilities in the larger villages. Retail provision could be provided but this is not outlined as a policy requirement. A slight positive effect is considered.	+1		+1
G) Meeting housing needs	The strategic option will meet the anticipated housing needs target for the district, a significant positive effect. Housing is concentrated at the villages where there are some services and facilities with the rest of the proposed development to be provided at the main towns where existing services and facilities are located.	+3		+3
H) Ensuring community health and wellbeing	The level of development proposed in rural areas may be disproportionate to the level of development a village can absorb. Although allocations would only be proposed in villages which meet the essential criteria set out in S13 as such a negative rather than significant negative effect is considered. Some development would also still occur in the main towns and villages which would allow for access to community facilities, open space and recreation. The option would focus development away from Crediton and Cullompton which are designated air quality management areas which would result in some positive impact. The option however would lead to greater light and noise pollution, particularly in villages where the scale of the development is greater than what	-3	Provision of community facilities, open space and recreation and air quality mitigation is justified in policies elsewhere in the plan and provide some mitigation for the lack of mention of community service and facilities. An overall negative effect remains as the rural distribution implied by the suggested alternative infers	-2

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>might be easily absorbed by the existing scale of the village. The policy does not mention the provision of open space, sport or recreation or the reduction of crime. Overall a significant negative effect given the disproportionate level of development at villages which may impact on local services and facilities and without the quantum of development in one location to provide a full range of new services and facilities.</p>		<p>that there would not be the quantum of development in any one location to provide a full range of new services and facilities.</p>	
<p>I) Delivering the necessary infrastructure</p>	<p>Option does not contribute towards the efficient use of existing infrastructure as it focusses growth in villages which although can support some growth the level of development proposed is disproportionate to the existing size of the villages which are often connected to the road network by B or C roads. There are potential road capacity issues which would require improvements across Mid Devon as development would be spread across the villages rather than being focussed in key locations. As development would be spread across Mid Devon, there is likely to be a need in more than one primary education facility for improvements. Given pressures on education and road infrastructure a significant effect is anticipated.</p>	<p>-3</p>	<p>The provision of infrastructure is justified in policies elsewhere in the plan. Policy S8 also provides mitigation by setting out that developers will be expected to contribute to, or bear the full cost of, new or improved infrastructure and facilities. Given the volume of areas that would require upgrading, mitigation in some cases may be limited as such a negative effect remains. This is uncertain given the number of proposals in rural areas although the sites are viewed</p>	<p>-2/?</p>

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			as deliverable the cumulative effect would depend on the site proposals and location in the district.	

Secondary/cumulative/synergistic effects:	A number of mitigation measures are suggested which are covered by other policies in the plan. The Local Plan Review should be read as a whole and would mitigate the sustainability issues which cross-reference across the plan. There may be a greater cumulative impact on the road network as there would not be the quantum of development in one location to enable the improvement of a single junction or access such as the options for a strategic allocations would allow, therefore at a number of points across the district there may be a greater level of traffic but limited funds for improvements.
Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Construction will occur over the lifetime of the Plan up to 2033. Once completed the effect will be permanent.
Spatial extent: (District wide / local)	Policy option meets the housing and commercial needs for the district. Distribution is dispersed with 39% proposed in rural areas.

**Alternative Option S2: Distribution of development - Tiverton and Crediton Focussed.**

Option concentrates development at Tiverton with maximum provision at Crediton based on the availability of sites. As such the breakdown of distribution is as follows: 48% Tiverton, 21% Cullompton, 15% Crediton, 16% Rural Areas. This distribution is based on a proposed alternative from a representation at the Proposed Submission stage requesting a higher development figure at Crediton whilst removing East Cullompton urban expansion. By removing the East Cullompton allocation 2100 dwellings would need to be redistributed. Using the highest capacity

figures for all the available sites in Crediton a maximum figure of 1047 has been derived with the rest of the development distributed to Tiverton and Rural Areas. As such this option would result in a Tiverton and Crediton focussed option with greater development in rural areas. For the purposes of the SA, development using this distribution would assume major development at Hartnoll Farm as the only suitable, available and achievable option in Tiverton and the allocation of all potential Crediton sites to the maximum capacity.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	The strategy continues to concentrate development at the districts main towns of Tiverton, Cullompton and Crediton. The policy acknowledges that development will be to a scale and mix appropriate to their individual infrastructures, economies, character and constraints. Development opportunities at Tiverton and Crediton are constrained by topography and the potential for landscape impact. This strategy accepts that a Tiverton and Crediton focussed approach would only be achievable with strategic growth at Hartnoll Farm as Tiverton’s only suitable, available and achievable site. The Hartnoll Farm site is bordered by the Grand Western Canal Conservation Area to the south and east of the site. The canal is also a County Wildlife Site and Local Nature Reserve. Development of the site would have a potential significant visual impact and would impact on the biodiversity and habitats of the area. This strategy option accords with the aspirations of the NPPF to prevent isolated new homes and to protect and enhance valued landscapes. There may also be opportunities for enhancement of landscape character and biodiversity, but this is likely to be on an	-3	The protection of the natural environment is justified in policies elsewhere in the plan. At Hartnoll Farm the policy requires environmental protection and enhancement which will help mitigate any negative impact on this objective by the development of this site. Land adjacent the Grand Western Canal will need to be protected as Green Infrastructure. Because some slight negative effects will remain with regard to Hartnoll Farm post mitigation in combination with the location of some of the Crediton sites	-2

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>individual site basis. Given the potential landscape and environmental impact at Hartnoll Farm in particular as well as other larger sites on the edge of the main towns an overall negative impact is considered. It would also result in the development of all potential sites available for allocation in Crediton to the maximum capacity. Given the topographical constraints some of the sites are in prominent locations in the town which would result in a negative impact. Together with the consideration of a negative effect of developing Hartnoll Farm a significant negative effect overall is considered.</p>		<p>are prominent and therefore landscape impacts will not be completely mitigated, overall a negative effect remains.</p>	
<p>B) Protection and promotion of a quality built and historic environment</p>	<p>New development in towns and villages has the potential to have a negative impact on the historic environment located in and around these settlements. In Crediton there are a number of listed buildings that may be affected. Some sites also fall within the Conservation Area or an area of archaeological potential. There may however be some opportunities for a positive effect through enhancement of heritage assets and local distinctiveness, but this is likely to be on an individual site basis. At Hartnoll Farm, the site lies in an area of archaeological potential with the HER recording prehistoric activity here and recent archaeological work has identified prehistoric activity across the wider landscape. A small part of the border is next to residential development and there are farm buildings within the site. The level of development proposed</p>	<p>-3/?</p>	<p>The protection of the historic environment is justified in policies elsewhere in the plan. At Hartnoll Farm, the proposal requires a public Masterplanning exercise to be undertaken before any planning application is made and which will improve the quality of the final design of the development. Archaeological investigation and appropriate mitigation to</p>	<p>-2/?</p>



Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>will be significant and therefore would likely impact the built and historic environment. However as there are no protected built or historic assets in or around the site the impact on this objective will be minor. In combination with the Tiverton Eastern Urban Extension (which is already allocated) development at Hartnoll Farm would represent a significant lengthening of Tiverton in an easterly direction along the valley floor. Two issues emerge; firstly as development extends ever easterly, the distance from town centre services increases as well as reliance on the private car and secondly the town will significantly close the gap between its urban areas with nearby villages such as Halberton, which currently has its own separate identity. The coalescence of Halberton is considered a negative effect that cannot be mitigated. Coupled with the potential impact on the historic environment including listed buildings a significant negative effect is considered although this aspect remains uncertain as the exact effect will depend on each individual proposal.</p>		<p>enhance sustainability. Coalescence of Tiverton with Halberton cannot be mitigated satisfactorily, a remaining negative effect after mitigation is considered. This remains uncertain given the archaeological impact is unknown before investigation.</p>	
C) Mitigating the effects of climate change	<p>By focusing new build development in the settlements where jobs and services are located the option will reduce the need to travel. However this option does also allocate greater development in rural areas and therefore will increased the need the travel in these locations. There is the potential for the provision of low carbon and renewable energy as part of larger development in and around the</p>	-1/?	<p>The protection against flood risk, surface water run-off and provision of renewable energy policy is justified in policies elsewhere in the plan. The unknown impact of the</p>	0/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>main towns. However Crediton is an Air Quality Management Area (AQMA) and although the Crediton Link Road has alleviated some traffic, maximising the capacity of development at Crediton may have a negative impact on the AQMA.</p> <p>Where some settlements are vulnerable to flood risk, new development would be subject to safeguards in policies, with levels of development dependent on the capacity of the settlement and available suitable land. There may be some opportunities for flood mitigation and promotion of low carbon and renewable energy measures, but this is likely to be on an individual site basis, for example through design. At Hartnoll Farm the entire site is in a low risk area (flood zone 1) being the area of least flood risk. There is an unnamed watercourse which has an unknown impact on flood risk. Evidence in the SFRA suggests that the site may have some residual flood risk from the Grand Western Canal or Wimbleball Reservoir. Transport provision to ensure appropriate accessibility for all modes is also supported by the policy and traffic through Halberton and Sampford Peverell is discouraged. There are no existing services, infrastructure or facilities within the site or in close proximity. Given the scale of the development at this site it is likely some negative impacts will occur with regard to carbon emissions through construction and increased traffic movement overall a slight negative effect is considered.</p>		<p>unnamed watercourse in the site remains. At Hartnoll Farm the policy should be read in the context of other policies in the plan which aim to mitigate the effects of climate change and reduce the risk of flooding.</p>	

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
D) Safeguarding and minimising resource use	There could be some loss of the best and most versatile agricultural land around some settlements and contribution to waste levels, a negative effect. New development will add to waste water levels however the option considers environmental capacity. At Hartnoll Farm, the majority of the site 68.7ha (71%) to the NE of the site is Grade 1 agricultural land. It is likely that this site will have a negative impact on this objective due to the scale of development of a site that is predominantly Grade 1 agricultural greenfield land which would be lost if this site is developed. The site will therefore have a significant negative impact on this objective.	-3	Policy should be read in conjunction with other policies within the plan and Devon County Council Waste Plan including those that set out the waste hierarchy.	-3
E) Promoting economic growth and employment	This option will have a positive effect on this objective as it increases jobs at existing main towns and settlements. The option also supports rural business by providing commercial floor space in villages. This option will help meet the employment needs of the district and enhance the economy in general while encouraging inward investment and future prosperity. The main towns have good connection to the strategic road network for storage and distribution uses. At Hartnoll Farm there are existing employment units on this site which could be retained. The policy option does not propose employment development on this site. Development of this scale would be a boost to local construction firms and associated trades who would benefit from being able to undertake contract work on the site. There would therefore be some positive	+2		+2

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
	impact.			
F) Supporting retail	Focusing development in the Tiverton, Crediton and larger villages will support the vitality and viability of existing town centres and shopping facilities in the larger villages. Although the option suggests retail provision could be provided this is not outlined as a policy requirement. At Hartnoll Farm, no retail is proposed however the high street would benefit from the custom of the residents from this development. There would be a positive effect.	+2		+2
G) Meeting housing needs	This option takes forward the Core Strategy development strategy by directing development to the existing main towns of Mid Devon until 2033. The strategic option will meet the anticipated housing needs target for the district, a significant positive effect. Housing is concentrated Tiverton and Crediton where existing services and facilities are located. The policy option allows for a scale and mix of development to help contribute to balanced communities. Overall a significant positive impact on meeting housing needs for the district.	+3		+3
H) Ensuring community health and wellbeing	Focusing development at the main towns and villages will result in the majority of new development having access to community facilities, open space and recreation available within existing settlements, a positive effect. Option focuses development towards Crediton which is a designated air quality management areas and would therefore would have a negative effect. There may be some	0	Provision of community facilities, open space and recreation and air quality mitigation is justified in policies elsewhere in the plan. At Hartnoll Farm, the option	+1

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>opportunities for mitigation measures, on a town wide basis. For example through new road layout / relief road and /or walking and cycling. Development is primarily focused away from Exmoor National Park an international dark sky reserve, a positive effect. Walking, cycling and public transport are encouraged through proximity of development to town centres and other key services, a slight positive effect as this option would result in greater development in rural areas. The mix of development will contribute to reducing social exclusion. Policy option supports limited development which meets local needs and promotes vibrant rural communities. Option will contribute towards light and noise pollution, a slight negative effect. The policy does not mention the provision of open space, sport or recreation or the reduction of crime, a slight negative impact. Overall a neutral impact.</p>		<p>promotes the delivery of community facilities to meet local needs arising and transport provision to ensure appropriate accessibility for all modes. An overall slight positive effect.</p>	
<p>l) Delivering the necessary infrastructure</p>	<p>Option contributes towards the efficient use of existing infrastructure by focusing growth in the main towns, reducing the need to travel. At Hartnoll Farm, the policy requires an agreed phasing strategy to bring forward development and infrastructure in step and retain the overall viability of development. There are potential highway capacity issues around this site which would require enhancements before this site is developed. Initial work from the Tiverton Eastern Urban Extension suggest that one of the only viable solutions to transport concerns regarding further</p>	<p>-3</p>	<p>The provision of infrastructure is justified in policies elsewhere in the plan. At Hartnoll Farm, the policy for this site requires a public Masterplanning exercise to be undertaken before any planning application is made. The site is therefore likely to</p>	<p>+2</p>

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>development to the East of Tiverton is a link road through the Blundells School site. The Mid Devon Community Infrastructure Evidence Report indicates that there are six primary schools located within Tiverton itself and these are largely accepting more students than their planned admission number. The development allocations will result in a need to provide additional primary education facilities. Places are mostly needed at the Tiverton EUE, which is the largest area of development by far. The masterplan for the area and forthcoming developments include the provision of a school site that can accommodate up to 420 pupils, which should be sufficient to meet the demand in Tiverton. Additional secondary places will be required to accommodate the development proposed to be allocated in the emerging Local Plan Review. Developer contributions will be required in order to fund these improvements. In Crediton both local schools need to expand and need to be supported by developer contributions/CIL. It should be noted that both schools are on constrained sites which are expensive to expand and may require additional land and buildings to expand across all year groups. Given the educational pressures in both Tiverton and Crediton and need for additional infrastructure an overall significant effect is considered.</p>		<p>deliver the necessary infrastructure for the site with the potential to also benefit the surrounding community. Policy S8 also provides mitigation by setting out that developers will be expected to contribute to, or bear the full cost of, new or improved infrastructure and facilities.</p>	

Secondary/cumulative/synergistic effects:	A number of mitigation measures are suggested which are covered by other policies in the plan.
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	The Local Plan Review should be read as a whole and would mitigate the sustainability issues which cross-reference across the plan. In Crediton the maximisation of all available allocation sites could have a negative cumulative impact on the air quality of the area, given that Crediton is an air quality management area with limited additional opportunity for strategic transport infrastructure. There are also negative cumulative landscape impact given the topography of Crediton leading to sites being developed in prominent locations. In combination with the existing Tiverton Eastern Urban Extension allocation, the Hartnoll Farm site would necessitate a relief road behind Blundells School.
Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Construction will occur over the lifetime of the Plan up to 2033. Once completed the effect will be permanent.
Spatial extent: (District wide / local)	Policy option meets the housing and commercial needs for the district. Development would be focussed at Tiverton and Crediton with greater distribution in rural areas. Policy option enables the distribution of development across the district to meet local needs.

**Preferred Option S2: Higher Growth Scenario Commercial including J27 option**

The development needs of the community will be met through the provision of approximately 215,000 square metres of commercial floorspace between 1 April 2013 and 31 March 2033.

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
A) Protection of the natural environment	In taking into account the impacts noted in the appraisal of the Junction 27 proposal there are some important trees to the north of the site and in close proximity to a number of TPOs. The site falls within the 'Lowland plains' landscape character area and is typified	-3/?	The Junction 27 policy requires environmental protection and enhancement including noise mitigation. Furthermore Policy	-1

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>as being an open, low lying flat landscape which is agriculturally prosperous. Development of this scale would have a significant impact on existing landscape character, altering the rural quality of the entrance into Mid Devon from the M5 and the rural character around Willand and Sampford Peverell. Landscape sensitivity is higher, primarily because of the lack of a relationship with an existing settlement, and the change to landscape character that would arise as a result. There are views available into the site from the west, as far as the canal in Sampford Peverell, whereas some parts feel isolated, with reduced visibility – though some parts are visible from the motorway. There are differences in character/visibility between the north and south, the north being more open and plainly visible, the south less so. The landscape appraisal for this site noted that employment development would potentially be more damaging from residential development owing to the larger scale buildings and infrastructure needed. A Phase I habitat survey for the northern commercial element of the site (Devon Biodiversity Records Centre, June 2014) was undertaken. The site includes a variety of habitat types including Biodiversity Action Plan habitats. The mature trees and hedgerows within the site were also identified as important for biodiversity.</p> <p>Natural England expressed the potential for the proposed leisure and retail development at J27 to impact on the Culm Grasslands</p>		<p>S9 ‘Environment’ and DM1 ‘High Quality Design’ in the Local Plan Review provide mitigation for both the impact on the landscape and the natural environment. The policy requires mitigation measures for the Culm Grasslands SAC where appropriate and the allocation will be subject to comprehensive masterplanning. Given the scale of development some landscape and biodiversity impact is likely to remain however mitigation provided helps to minimise the impact. The area considered is less than that appraised in the Proposed Submission SA and the proposal now considers mitigation if there is an impact</p>	



Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	SAC due to traffic impacting the air quality. Further information regarding traffic assessments and any consequential air quality assessment on the effects on this SAC will have to be undertaken to rule out any effect. Given the scale of development, impact on the landscape, biodiversity and potential impact on the Culm Grasslands SAC, overall a significant negative impact is considered although this remains uncertain.		on the Culm Grasslands, as such overall a slight negative effect is considered.	
B) Protection and promotion of a quality built and historic environment	In taking into account the impacts noted in the appraisal of the Junction 27 proposal there are listed buildings close to the site and there may be some impact the immediate settings of these buildings. To some degree there will be an impact on the registered park and garden at Bridwell which is set on rising land to the east. To a limited degree the landscape settings of Sampford Peverell conservation area and the Grand Western Canal conservation area will also be affected. There is some uncertainty in the exact impact of the allocation given this will be dependent on site layouts, density, scale and design of buildings. This site occupies a substantial area within a landscape that has evidence of prehistoric and Roman activity, overall a negative and uncertain effect.	-2/?	The policy should be considered in the context of other policies which aim to protect heritage assets and which promote high quality design which supports the positive contribution of new development to local character including the J27 allocation proposal. A neutral effect is considered, this remains uncertain given the masterplan for the J27 option is not yet adopted.	0/?
C) Mitigating the effects of	In taking into account the impacts noted in the appraisal of the Junction 27 proposal it is recognised that the site contains a number	-3/?	The protection against flood risk, surface water run-off and	-1/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
climate change	<p>of small streams but is located in flood zone 1 the lowest level of flood risk, a neutral effect. The site may also have some residual flood risk from the Grand Western Canal or Wimbleball Reservoir. The site could also contribute to surface water run off without appropriate mitigation measures. Given the scale of development carbon emissions could be high. Overall a significant negative effect and uncertain effect is considered given the potential but unknown impact of the small streams, the potential contribution to surface water run off and increased carbon emissions.</p>		<p>provision of renewable energy policy is justified in policies elsewhere in the plan including the J27 allocation option. Carbon emissions will be mitigated where possible, but the increase in traffic will still result in a slight negative impact. Uncertainty remains due to the unknown element of the small streams.</p>	
D) Safeguarding and minimising resource use	<p>In comparison to the previously assessed higher growth scenario which identified this as a significant negative effect concluding that a large number of sites would be required to meet the amount of commercial floorspace proposed, this alternative looks at one site which has the benefit of spin-off trade and linked trips. In taking into account the impacts noted in the appraisal of the Junction 27 proposal it is recognised that part of the Junction 27 site borders the Mineral Consultation Area for Hillhead Quarry. Since the Proposed Submission Sustainability Appraisal, given the smaller site area and updated Devon County Council Minerals Plan (proposed for adoption) it is considered the development of the site will not constrain future working of the remaining permitted reserves within</p>	-2		-2

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	Hillhead Quarry. The site is located on mainly greenfield land with a small portion on brownfield land. The majority of the site is Grade 3 good / moderate quality land with a small section of the site to the west of the M5 grade 4 poor quality land. Given the scale of the development, on Grade 3 agricultural land a negative effect is considered.			
E) Promoting economic growth and employment	This policy will have a significant positive contribution towards achieving this objective. Development in this location and at this scale has the potential to bring major inward investment and job creation for Mid Devon and the wider region.	+3		+3
F) Supporting retail	In taking into account the impacts noted in the appraisal of the Junction 27 proposal the option will deliver a 6ha designer outlet shopping centre, which will include up to 14,000 square metres of controlled comparison goods and up to 2,000 square metres of A3 uses. Since the Proposed Submission Sustainability Appraisal of the Junction 27 option a number of town centre uses have been withdrawn from the earlier promoted schemes and a retail impact assessment has been used to determine the impact. This included an assessment of 14 towns and city centres including those outside of Mid Devon District and concluded that all centres would continue to achieve higher future trading turnovers than at the assessment year. The study also sets out how designer outlet villages differ from that in town centres and how they can be controlled by planning.	+3		+3

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
	Given the changes proposed to the Junction 27 policy and the findings of the retail impact assessment, the proposal significantly enhances the retail offer of the district a significant positive impact is considered.			
G) Meeting housing needs	The Local Plan will provide for the additional housing required in response to the employment opportunity provided by this allocation. A neutral effect is considered.	0		0
H) Ensuring community health and wellbeing	In taking into account the impacts noted in the appraisal of the Junction 27 proposal the option will provide some benefit to existing and future communities in which it provides leisure and retail opportunities. In taking into account the policy as a whole the option enhances existing policy as it broadens the potential use classes which will be promoted by the policy including development for healthcare, education and public facilities, overall a positive effect.	+2		+2
I) Delivering the necessary infrastructure	In taking into account the impacts noted in the appraisal of the Junction 27 proposal, there is potential for this to have a negative effect if not planned appropriately although this remains uncertain.	-2/?	In taking into account the mitigation recommended in the Junction 27 proposal the policy seeks the provision of supporting access roads, parking, infrastructure and landscaping of 43ha. It requires transport	+2/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			<p>improvements to ensure appropriate accessibility for all modes, including new or improved access and egress onto the M5 motorway and pedestrian and cycling links across the motorway to Tiverton Parkway Railway Station. Furthermore comprehensive masterplanning is required by policy will provide greater detail on delivering the necessary infrastructure. The policy also requires environmental protection and enhancement with the supporting text referencing the provision of green infrastructure. Overall a positive effect is considered, the uncertainty remains as the detail of providing the</p>	

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			necessary infrastructure will be considered at the masterplanning and planning application stage.	

Secondary/cumulative/synergistic effects:	A Habitat Regulations Assessment of the Mid Devon Local Plan Review including Junction 27 has been undertaken which concludes that the J27 site allocation, alone or in combination with the Local Plan proposals, will not have an adverse effect on the integrity of the Culm Grasslands SAC.			
Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Construction will occur over the lifetime of the Plan up to 2033. Once completed the effect will be permanent.			
Spatial extent: (District wide / local)	Policy option aims to meet the housing needs across the district.			

### **Additional Appraisals for S3 Meeting housing need**

#### **Preferred Option S3: Gypsy sites distribution of development – Town focussed urban extensions**

This alternative distributes the gypsy pitches across the district by allocating gypsy and traveller pitches within strategic and large allocations to meet the predicted need.

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
A) Protection of the natural	This strategy concentrates development at the districts main towns of Tiverton, Cullompton and Crediton. Given that the allocation of	0	The protection of the natural environment is justified in	0

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
environment	gypsy pitches are proposed in areas already identified as suitable for other forms of development, the additional impact on the natural environment by allocating gypsy and traveller pitches would be a neutral impact.		policies elsewhere in the plan which aim to protect the natural environment and ensure that the most valued landscapes and designated biodiversity and geodiversity sites are conserved.	
B) Protection and promotion of a quality built and historic environment	The allocation of gypsy and traveller pitches in strategic or large allocations enables the pitches to be appropriately designed and planned with a suitable relationship with other forms of development. Being in the main towns and as part of strategic or large sites enables the number of pitches or plots to be well-related to the size and location of the site and the surrounding population's size and density. Given the good relationship with the built environment a slight positive impact is considered.	+1	The protection of the historic environment is justified in policies elsewhere in the plan which aim to protect heritage assets and which promote high quality design.	+1
C) Mitigating the effects of climate change	The provision in the main towns ensures that travellers are able to access education, health, welfare and employment infrastructure minimising travel to access these services and facilities. Overall a neutral effect.	0	The protection against flood risk, surface water run-off is justified in policies elsewhere in the plan.	0
D) Safeguarding and minimising resource use	The strategic and large sites identified in the Local Plan Review have a range of agricultural land classifications with some sites on grades 1 and 2. However by allocating such sites within strategic and large sites already identified for development, it minimises the need to	-1		-1

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
	develop on additional land therefore overall a slight negative effect is considered.			
E) Promoting economic growth and employment	No effect.	0		0
F) Supporting retail	No effect.	0		0
G) Meeting housing needs	The policy notes that a five year supply of gypsy and traveller pitches will be allocated on deliverable sites within Mid Devon to ensure that the predicted need for traveller sites will be met. This scenario identifies the sites within the main towns as part of the strategic and large allocations. Overall a significant positive effect.	+3		+3
H) Ensuring community health and wellbeing	The provision in the main towns ensures that travellers are able to access education, health, welfare and employment infrastructure. The allocation of gypsy and traveller pitches in strategic or large allocations enables the pitches to be appropriately designed and planned with a suitable relationship with other forms of development reducing tensions between the settled and traveller communities. Overall a positive impact.	+2		+2
I) Delivering the necessary infrastructure	The provision in the main towns ensures that existing infrastructure is able to provide for the travelling community including schools, health services, roads and transportation. Any additional	0	The policy should be read in the context of other policies which aim to deliver	0



Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	infrastructure required can be planned and designed as part of the total site. Overall a neutral effect is considered.		infrastructure. Any proposals will also have to abide to the infrastructure policy in the plan.	

Secondary/cumulative/synergistic effects:	A number of mitigation measures are suggested which are covered by other policies in the plan. The Local Plan Review should be read as a whole and would mitigate the sustainability issues which cross-reference across the plan.			
Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Construction will occur over the lifetime of the Plan up to 2033. Once completed the effect will be permanent.			
Spatial extent: (District wide / local)	Policy option meets the gypsy and traveller needs of the district which are providing on strategic or large site at the main towns.			

***Alternative Option S3: Gypsy sites distribution of development – Rural focussed new sites***

This strategy would focus the distribution of gypsy and traveller pitches across Mid Devon in defined villages.

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
A) Protection of the natural environment	The strategy concentrates gypsy and traveller pitches across rural areas in defined villages. The strategy is likely to have some landscape impact given that the sites would likely occur on the edge of villages in where there would be a slight negative effect.	-2/?	The protection of the natural environment is justified in policies elsewhere in the plan and there may be some	-1/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>There is the risk of some gypsy and traveller sites to be disproportionate to the scale of a village in a rural setting which would lead to a further negative effect although this is uncertain as this would depend on specific site allocations. Overall a negative although uncertain effect is considered given that the exact impact will depend on specific site allocations.</p>		<p>opportunities for enhancement of landscape character and biodiversity on an individual site basis. Therefore overall a slight negative although uncertain effect is considered given that some impact may be mitigated but this is uncertain as it'll depend on specific site allocations.</p>	
<p>B) Protection and promotion of a quality built and historic environment</p>	<p>The allocation of gypsy and traveller pitches across rural areas means there is less scope for the site to be designed and planned as you could in a strategic or large allocation. There is also the risk that although allocated sites in rural areas should generally be smaller in scale in comparison to strategic and large sites within the district they could be of a scale large enough to be disproportionate to small settled communities. Overall a negative effect although uncertain as the exact impact will be dependent on specific site allocations.</p>	<p>-2/?</p>	<p>The protection of the historic environment is justified in policies elsewhere in the plan and some mitigation can be provided on a case-by-case basis in which heritage assets and local distinctiveness will be enhancement. Therefore overall a slight negative although uncertain effect is considered as the exact impact will depend on specific site</p>	<p>-2/?</p>

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
			allocations.	
C) Mitigating the effects of climate change	By focussing new build development in rural areas, this will increase the need to travel and therefore increase greenhouse gas emissions. Overall a negative effect is considered.	-2	The protection against flood risk, surface water run-off is justified in policies elsewhere in the plan.	-2
D) Safeguarding and minimising resource use	The option scores negatively towards safeguarding and minimising resource use as it focuses new development in villages in which would likely result in the loss of greenfield development and loss of some of the best and most versatile agricultural land. Overall a negative effect is considered.	-2		-2
E) Promoting economic growth and employment	No effect	0		0
F) Supporting retail	No effect	0		0
G) Meeting housing needs	The policy notes that a five year supply of gypsy and traveller pitches will be allocated on deliverable sites within Mid Devon to ensure that the predicted need for traveller sites will be met. This scenario will lead to sites being identified in rural areas to meet this need. Overall a significant positive effect.	+3		+3
H) Ensuring community	The provision in rural areas means that travellers are less able to access education, health, welfare and employment infrastructure	-2	Provision of community facilities, open space and	-1

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
health and wellbeing	than if allocated in towns. Although there are opportunities within villages for this provision which on balance would lead to only a slight negative effect. Without being part of strategic or large allocations, there is less opportunity for pitches to be appropriately designed and planned with a suitable relationship with other forms of development. In considering these issues overall a negative effect is considered although uncertain given that this will rely on the design and site specific allocation.		recreation and air quality mitigation is justified in policies elsewhere in the plan and provide some mitigation. An overall slight negative effect remains as there is not the quantum of development in one location to provide a full range of new services and facilities.	
l) Delivering the necessary infrastructure	The provision in rural areas means that such sites may put additional pressure on existing infrastructure and may require the provision of additional infrastructure separate to other forms of development making such provision more resource intensive in comparison to the provision on strategic or large allocations. Overall a slight negative effect is considered.	-1	The provision of infrastructure is justified in policies elsewhere in the plan. Policy S8 also provides mitigation by setting out that developers will be expected to contribute to, or bear the full cost of, new or improved infrastructure and facilities.	0

Secondary/cumulative/synergistic effects:	A number of mitigation measures are suggested which are covered by other policies in the plan. The Local Plan Review should be read as a whole and would mitigate the sustainability issues which cross-reference across the plan.
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Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Construction will occur over the lifetime of the Plan up to 2033. Once completed the effect will be permanent.
Spatial extent: (District wide / local)	Policy option meets the gypsy and traveller needs of the district which are providing on strategic or large site at the main towns.

### **Additional Appraisals for S13 Villages**

#### **Alternative Option S13: Edge of Village development**

Policy identifies a list of 22 rural settlements designated as villages and suitable for small scale housing, employment, tourism and leisure, services and facilities and limited development that enhances community vitality or meets local social or economic need. The policy deviates from Core Strategy through the identification of Bampton as a rural village. The definition of “rural village” within the supporting text has also been simplified to require settlements to only require three key services for inclusion; an education facility, convenience store and transport service. Based on the amended criteria, Holcombe Rogus is identified as an additional settlement. Burlescombe (including Westleigh) did not meet the essential criteria. Yeoford does not meet the essential criteria of the policy as it does not have a shop however it has been included as an exception because of its strong transport links, a bus and daily train service. This alternative proposes edge-of-village development where housing delivery across the district falls below defined ‘action levels’ or the Council is unable to demonstrate a five year housing supply.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	Development would be limited to minor proposals within the defined settlement limits, unless housing delivery falls below defined ‘action levels’ or the Council is unable to demonstrate a five year housing supply in which development would be allowed on	+1	The policy should be read in the context of other policies in the plan.	+1

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	edge of village. This policy in general protects the countryside. Hemyock (an identified village) is located in the Blackdown Hills Area of Outstanding Natural Beauty (AONB). The impact does not result in a significant positive impact as in some cases edge of village development may occur which may have a greater impact than the proposed policy which ensures development is within settlement limits, overall a slight positive effect.			
B) Protection and promotion of a quality built and historic environment	The policy makes no reference to the built or historic environment. A large number of the villages have conservation areas. A slight negative effect is considered as edge of village development where housing delivery falls below defined 'action levels' or the Council is unable to demonstrate a five year housing supply could result in a cumulative negative impact on the built environment given that development would expand existing villages beyond their identified settlement limits.	-1		-1
C) Mitigating the effects of climate change	The policy makes no reference to climate change mitigation or flood risk. The option directs some limited growth to villages with the most services therefore reducing the need to travel, a minor positive effect. A slight negative effect is considered as edge of village development could lead to increase the need to travel as development could be greater than existing services can sustain. Overall a neutral effect is considered.	0		0
D)	The policy makes no reference to safeguarding or minimising	0/?		0/?

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
Safeguarding and minimising resource use	resources. It is uncertain the level of development that could occur through edge of village development and what impact this would have on this objective. Therefore an uncertain effect is considered.			
E) Promoting economic growth and employment	Criteria within the policy allow for employment, tourism and leisure development within rural settlements and development that enhances community vitality and social and economic needs, a significant positive effect towards economic growth and employment in the district.	+3		+3
F) Supporting retail	Criteria within the policy allow for services and facilities within rural settlements and development that enhances community vitality and social and economic needs, a significant positive effect towards supporting the self-sufficiency of rural shopping.	+3		+3
G) Meeting housing needs	National planning policy advocates the provision of market housing in rural areas where it would facilitate the delivery of significant affordable housing required to meet housing need. To facilitate the provision of affordable housing in villages across Mid Devon, the supporting text of the policy clarifies that some market housing may be permitted. Rural exception sites will also be considered in line with development management policies and an existing Supplementary Planning Document on Meeting Housing Needs. In appropriate circumstances, self-build housing will be permitted through the exceptions policy. Edge of village development is also	+3		+3

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>promoted where housing delivery falls below defined 'action levels' or the Council is unable to demonstrate a five year housing supply. The policy is supportive of small scale housing, a significant positive effect.</p>			
H) Ensuring community health and wellbeing	<p>The policy criteria allow for service and facilities serving the locality and other limited development which enhances community vitality or meets a local social or economic need. The policy contributes towards maintaining and enhancing community facilities, provision of open space and the district's cultural sport and recreation opportunities. This wording directly accords with the SA objective to ensure community health and well-being, a significant positive effect. The supporting text lists transport services as one of the key criteria for defining rural settlements and therefore the list of 22 settlements will be locations most accessible by public transport. Edge of village development beyond the settlement limits of the villages defined could lead to development greater than existing services can sustain, a negative effect. On-balance the policy is considered to have a slight positive effect.</p>	+1	The policy should also be read in the context of other policies in the plan.	+1
I) Delivering the necessary infrastructure	<p>The supporting text clarifies that rural settlements should include an education facility, convenience store and transport service to be listed as a sustainable location for development. Burlescombe (including Westleigh) did not meet the essential criteria and are not proposed to be carried forward. Yeoford does not meet the</p>	+1	The policy should be read in the context of other policies in the plan.	+1



Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>essential criteria of the policy as it does not have a shop however it has been included for its strong transport links with provision of a bus and daily train service, a positive effect. The policy directs development to sustainable locations helping to reduce the overall need to travel, reducing traffic congestion and increasing access to key services, a significant positive effect. As the criteria do not list access to health or social care, this option could be directing development away from the most sustainable locations in respect of health, a negative effect. A slight negative effect is also felt due to the potential for edge of village development which would be beyond the settlement limits of the villages and therefore could put greater pressure on existing infrastructure. On-balance the policy option is considered to have a slight positive effect.</p>			

Secondary/cumulative/synergistic effects:	<p>The policy should work alongside Policy S3 Meeting Housing Need which sets out an exception test for affordable housing and self-build. The provision of edge of village development where housing delivery falls below defined 'action levels' or the Council is unable to demonstrate a five year housing supply could lead to greater cumulative impacts given that these would be beyond settlement limits and therefore would be less contained.</p>
Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	<p>Development will occur throughout the lifetime of the plan up to 2033 and the effect should be considered permanent.</p>
Spatial extent: (District wide / local)	<p>Policy is restricted to land within defined settlement limits of villages unless housing delivery falls</p>

	below defined 'action levels' or the Council is unable to demonstrate a five year housing supply in which edge of settlement development is enabled.
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## Site Allocations

### Additional Appraisals for Tiverton allocations

#### ***Preferred Option TIV16: Blundells School: 14ha 200 dwellings***

A site of 14 hectares north of Blundells School is proposed for 200 dwellings (28% affordable), 8 hectares of informal green infrastructure, land shaping to raise areas for development above flood zone 3, provision of a junction of Heathcoat Way and a safeguarded road route through the site to serve as a future second strategic road access for development at Tiverton eastern urban extension, provision and enhancement of cycle and pedestrian links in the area, site contamination assessment and remediation, provision of sustainable urban drainage and implementation of transport plans.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	The site is located within the settlement of Tiverton. There is minimal impact on landscape character and development could improve the current site which comprises of a number of elements including a scrap yard and former poultry handling factory.	+2		+2
B) Protection and promotion of a quality built and historic environment	The site lies in an area of archaeological potential with regard to known prehistoric activity in the wider landscape. The southern boundary of the site is adjacent the Blundell's Conservation Area and development would need to have consideration of the conservation area with regard to design. In taking these elements into account the impact pre-mitigation could be negative although this is uncertain given the impact on the area of	-1/?	The policy provides for design which respects and enhances the character and appearance of the Conservation Area. It also provides for archaeological investigation and appropriate mitigation. In	+1/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	archaeological potential is unknown. The regeneration and sustainability benefits arising from redeveloping this site overall will have a slight positive effect, on balance taking into account the potential impact on archaeology, conservation area but the benefit of regeneration overall a slight negative effect is considered. This is uncertain given the impact on archaeological potential is unknown.		taking into account these mitigation measures and the benefit of the regeneration of this site a slight positive effect is considered overall, although this remains uncertain as the results of the archaeological investigation remain unknown.	
C) Mitigating the effects of climate change	The majority of the site is in flood zone 3 (62%). With the remainder of the site in FZ1 and FZ2. Evidence in the SFRA suggests that the site may have some residual flood risk from the Grand Western Canal or Wimbleball Reservoir. Development could lead to increased surface run-off a negative effect. Given the majority of the site lies within flood zone 3 and the risk of increased surface water run-off a significant negative impact is considered pre-mitigation.	-3	The policy requires land shaping to raise areas for development above flood zone 3, including an allowance for climate change, and to create additional floodplain to compensate for the loss of floodplain; mitigation measures through the provision of Sustainable Urban Drainage Schemes to deal with surface water run-off and arrangements for future maintenance and implementation of transport	+2

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			plans and other non-traditional transport measures to minimise carbon footprint and air quality impacts. Furthermore the Environment Agency is supportive of this allocation given the opportunity it provides to assist in the provision of wider flood risk mitigation proposals in the area. Given the mitigation to offset the pre-mitigation impacts and the benefit of the wider flood risk mitigation a positive impact is considered.	
D) Safeguarding and minimising resource use	0.7ha is contaminated land (food processing). This site is comprised of brownfield and grade 4 greenfield land. The development of this site would result in both a positive and negative impact but on balance an overall negative score reflecting contaminated land.	-2	The policy requires a site contamination assessment and remediation to mitigate risks associated with the former and current land uses. Taking this into account and regeneration of the site of	+2

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			which part of the site will re-use brownfield land a positive impact is considered.	
E) Promoting economic growth and employment	The development of this site would result in the loss of vacant industrial land a negative effect. The proposed allocation does not provide for additional employment land however the large scale residential development will have some positive impact including boosting local construction firms and associated trades who would benefit from being able to undertake contract work on the site. Overall, on balance a slight negative effect is considered.	-1		-1
F) Supporting retail	This site would add to housing in a town, close to the town centre. There is potential for this site to support retail in Tiverton overall a positive effect.	+2		+2
G) Meeting housing needs	The site allocation will provide for 200 dwellings which will include 28% affordable housing. The site therefore will have a significant positive impact on meeting housing needs for the district.	+3		+3
H) Ensuring community health and wellbeing	The option may contribute towards light and noise pollution however the site is also close to the town centre of Tiverton and therefore is likely to be within walking distance to services. The development of this site is therefore likely to have a slight positive impact on this objective.	+1	The site option requires the provision and enhancement of cycle and pedestrian links in the area a positive impact. The option policy requires the	+2

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			remediation of contaminated land which will remove pollutants. It also requires the implementation of transport plans and other transport measures to minimise carbon footprint and air quality impacts. Overall a positive impact is considered.	
l) Delivering the necessary infrastructure	<p>The policy requires land shaping to raise areas for development above flood zone 3 and the provision of a junction on Heathcoat Way and safeguarded route through the site to serve as a future second strategic road access for development at Tiverton eastern urban extension.</p> <p>The option is likely to deliver the necessary infrastructure for the site. The Mid Devon Community Infrastructure Evidence Report indicates that there are six primary schools located within Tiverton itself and these are largely accepting more students than their planned admission number. The development allocations will result in a need to provide additional primary education facilities. It is anticipated that this development will not as an individual site put pressure on the local secondary schools however additional secondary places will be required to</p>	-1	The site is likely to deliver the necessary infrastructure for the site and a safeguarded route to serve future communities. The policy option requires the provision and enhancement of cycle and pedestrian links in the area. It also requires implementation of transport plans and other transport measures to minimise carbon footprint and air quality impacts. Policy S8 also provides mitigation by	+1

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	accommodate the development proposed to be allocated in the emerging local Plan Review. Developer contributions will be required in order to fund these improvements. Overall a slight negative impact is considered.		setting out that developers will be expected to contribute to, or bear the full cost of, new or improved infrastructure and facilities; overall a slight positive effect is considered.	

Secondary/cumulative/synergistic effects:	The development overall will help meet the housing needs of Tiverton including affordable housing. It will also assist in the provision of wider flood risk mitigation proposals in the area. The policy also requires a safeguarded route through the site to serve as a future second strategic road access for development at Tiverton eastern urban extension. Furthermore there is the benefit of remediating contaminated land in this area.
Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Within the short term, construction traffic associated with the development will contribute towards traffic increase within the town. The proposal will provide long term benefits for the wider area including flood risk mitigation, remediation of contaminated land and provides a safeguarded route through the site to serve as a future second strategic road access for development at Tiverton eastern urban extension. Once developed the development will be permanent.
Spatial extent: (District wide / local)	This site option will help provide housing within Tiverton including for affordable housing. Development would be focussed in Tiverton, the largest town in the district.



**Alternative Option TIV13 Tidcombe Hall (contingency site): 8.4ha 200 dwellings**

This alternative re-considers the allocation as set out in the options consultation taking into account the information set out in the Historic Environment Appraisal (HEA), updated methodology in the SA with regard to site allocation appraisals and reasons for the reduction in total dwellings based on SHLAA panel recommendations.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	The site contains mature hedgerows and trees and the canal is also a defined County Wildlife Site & Local Nature Reserve. The site falls within the 'Lowland plains' landscape character area and is typified as being an open, low lying flat landscape which is agriculturally prosperous. There is a potential, but localised impact on character as the site is reasonably well contained within the landscape. There would be some impact arising from development, though this would be against the backdrop of the existing built environment to the west, a negative effect. Given the proposed density of the site, it is considered there would be some impact on the canal in which the HEA opposes development coming further forwards towards the canal. Overall, there is potential for a significant negative effect with the density proposed.	-3	The policy option requires the protection of the setting of the Grand Western Canal, Tidcombe Hall and Conservation Areas which provides some mitigation, a negative effect overall.	-2
B) Protection and promotion of a quality built and historic	The site is located on the south eastern edge of Tiverton and is close to the Grand Western Canal Conservation Area with 1.6ha of the site is within the Grand Western Canal Conservation Area (19% northern part). This site includes the site of the medieval	-2/?	Mitigation through policy to protect the setting of the canal, Tidcombe Hall and Conservation Area may be	-2/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
environment	<p>chapel of St Lawrence and Tidcombe Hall. The site lies just to the west of Tidcombe Farmhouse which contains Tidcombe Hall, a 19<sup>th</sup> century house that was formerly a rectory. There is also a record of a domestic chapel at this site that was licensed in the early 15th century. A desk-based assessment followed by appropriate archaeological mitigation would be required.</p>		<p>limited given the density of development proposed. The HEA notes that design is important to mitigate the impact of development particularly to the south and east of the hall where impact could be significant but will depend on design, landscaping etc.</p> <p>Archaeological mitigation in the form of a programme of archaeological work undertaken through the application of a standard worded archaeological condition on any consent granted may also be required. The scale of the development proposed may limit the level of mitigation available to protect the built and historic environment, as such a</p>	

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			negative although uncertain effect remains.	
C) Mitigating the effects of climate change	The site is located in Flood zone 1 the lowest level of flood risk. Evidence in the SFRA suggests that the site may also have some residual flood risk from the Grand Western Canal or Wimbleball Reservoir. Development on the site may increase surface water run-off. A negative effect. There is also an unnamed watercourse flowing through the site for which there is no flooding data available, overall a negative and uncertain effect.	-3/?	A policy requirement in the Local Plan Review seeks mitigation measures through the provision of Sustainable Urban Drainage Schemes to deal with surface water run-off and arrangements for future maintenance.  Policy criteria, seeks walking and cycling enhancements and connection to surrounding public rights of way and green infrastructure. Appropriate mitigation measures should be incorporated into the design of development to respond to the flood risk from the Grand Western Canal or Wimbleball Reservoir. If mitigation measures are incorporated a neutral effect is considered.	0/?

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
			Uncertainty remains as the impact of the unnamed watercourse is not yet known.	
D) Safeguarding and minimising resource use	The site is made up of a variation of land which has a number of different grades, including urban land and grade 1 agricultural land. Development option is located partly on greenfield land which would be lost if this site is developed. As approximately 75% of the site is made up of Grade 1 and Grade 2 agricultural land, development of this site will have a negative impact on this objective.	-3		-3
E) Promoting economic growth and employment	Site option does not result in the loss or gain of employment land. Development of this scale would be a boost to local construction firms and associated trades who would benefit from being able to undertake contract work on the site. There would therefore be some positive impact.	+1		+1
F) Supporting retail	The policy contains no retail proposals, however the high street would benefit from the custom of the residents from this development. There would be a positive effect.	+2		+2
G) Meeting housing needs	Option provides for 200 new dwellings a contribution towards future housing need and includes provision for affordable housing, a significant positive effect.	+3		+3
H) Ensuring community	There are shops along Canal Hill which are easily accessible, but the site is not within walking distance of Tiverton town centre, a	-1	Policy criteria, seeks walking and cycling enhancements and	0

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
health and wellbeing	slight negative effect. There are bus stops located on Tidcombe Lane and a footpath on the opposite site of Tidcombe Lane leading to Canal Hill.		connection to surrounding public rights of way and green infrastructure.	
l) Delivering the necessary infrastructure	A key factor is access. Tidcombe Lane has limited width without footways and Tidcombe Bridge is similar. Improvements to Tidcombe Lane will be necessary northwards from the site to ensure the safety of pedestrians, although will not necessarily increase its traffic capacity. A single vehicular access point on to Canal Hill will need to be supplemented with a secondary emergency access designed to be located at the end of the main cul-de-sac within the site. The Mid Devon Community Infrastructure Evidence Report indicates that there are six primary schools located within Tiverton itself and these are largely accepting more students than their planned admission number. The development allocations will result in a need to provide additional primary education facilities. Additional secondary places will be required to accommodate the development proposed to be allocated in the emerging Local Plan Review. Developer contributions will be required in order to fund these improvements. Given school capacity and site access issues given the scale of development proposed a significant negative effect is considered.	-3	Criteria within the policy seek a vehicular access points from Canal Hill and improvements to Tidcombe Lane northwards from the site. However given the scale of development proposed and access limitations, it is considered a negative effect remains.	-2

Secondary/cumulative/synergistic effects:	The development overall will help meet the housing needs of Tiverton including affordable housing. Given the level of development proposed it is anticipated there will be a likely negative cumulative impact on the road network.
Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Within the short term, construction traffic associated with the development will contribute towards traffic increase within the town. There is potential for long term issues with access to the site due to the level of development proposed.
Spatial extent: (District wide / local)	This site option will help provide housing within Tiverton including for affordable housing. Development would be focussed in Tiverton, the largest town in the district.

**Alternative Option TIV14 Wynnards Mead: New information, impact with existing mitigation**

A site of 6.3 hectares at Wynnards Mead, Bakers Hill is allocated for residential development, subject to; 70 dwellings (28% affordable), design that minimises impact to landscape character and setting of the adjoining listed building and unlisted building (Wynnards Mead), upgrading the lane to provide vehicular access point with the existing access to Wynnards Mead to form a secondary access for pedestrian and cyclists and site contamination assessment with mitigation for the historic quarry. New information has been provided by the Historic Environment Assessment (HEA) and a representation by the Environment Agency (EA) which assesses the harm to the historic environment and flood risk.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	This site falls within the 'River valley slopes and combes' landscape character area. This area typically falls within the River Exe valley and often has steep, wooded sides and a strong sense of enclosure within a lush valley landscape. The site is elevated, and therefore is visible from a number of viewpoints, including Seven Crosses Road to the south. Accordingly, there would be	-2	The site capacity was reduced to 70 dwellings down from 100 dwellings to reflect site constraints originally identified. The policy requires design which minimises impact	-1

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
	some impact from development in this location, a negative effect.		to the landscape character, overall a minor negative impact with this mitigation measure.	
B) Protection and promotion of a quality built and historic environment	The site, which lies to the west of Tiverton, consists of the grounds of a large house called 'Wynnards Mead', including some associated agricultural land and two cottages. Gotham adjoins the site to the west. The site is in close proximity to a listed building to the immediate west of the site. In response to a request made by Historic England a Historic Environment Assessment (HEA) was undertaken which has indicated that the policy as proposed would have a very damaging impact on the settings of Gotham (recently upgraded listed building to II*) and Wynnards Mead (heritage asset). Given the concerns and clarity provided in the HEA a significant negative impact is considered.	-3	Criteria within the policy requires design which protects the character and setting of the adjoining listed buildings and the unlisted house within the site 'Wynnards Mead'. However the HEA suggests significant buffers are required to reduce the impact on the relevant buildings. The mitigation suggested in the policy with the quantum of development proposed would not be capable of providing the mitigation suggested in the HEA, therefore a significant negative effect remains.	-3
C) Mitigating the effects of climate	The site is set on the north side of the Cottey Brook, sloping down north to south. The largest portion of the site in the north is	-2	A policy requirement in the Local Plan Review seeks	-2

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
change	located in flood zone 1, the lowest risk of flooding. The southern edge of the site is within flood zone 3 where the Cottey Brook runs along the southern boundary. Development could lead to increased surface water run-off, a negative effect.		mitigation measures through the provision of Sustainable Urban Drainage Schemes to deal with surface water run-off and arrangements for future maintenance which provides some mitigation. However a negative effect remains given that new information from the EA suggests a 7m wide buffer around Cottey Brook is required to allow for future maintenance of the watercourse which isn't currently mitigated in the policy.	
D) Safeguarding and minimising resource use	2.1ha (33% S and W) of the site is located on Grade 3 very good quality agricultural land, 4.2ha (67% NE) of the site is located on unclassified agricultural grade and a small area of contaminated land (historic quarry, 0.06ha in north). On balance development of this site would result a minor negative impact on this objective.	-1/?	Criteria in policy require site contamination assessment and remediation to mitigate risks associated with the historic quarry to the north of the site. A negative effect remains due to the partially known	-1/?



<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
			agricultural grade of land.	
E) Promoting economic growth and employment	Site option does not result in the loss or gain of employment land. A neutral effect.	0		0
F) Supporting retail	The policy contains no retail proposals, however the high street would benefit from the custom of the residents from this development. There would be a minor positive effect.	+1		+1
G) Meeting housing needs	Option provides for 70 new dwellings a contribution towards future housing need including affordable housing, a positive effect.	+2		+2
H) Ensuring community health and wellbeing	The services and facilities of Tiverton lie some 1.2 km distant. The site is located within walking distance to Tiverton town centre and is close to a bus service into Tiverton.	+1		+1
I) Delivering the necessary infrastructure	An adequate site access is achievable however the existing carriageway and footway links to Tiverton are very steep. The Mid Devon Community Infrastructure Evidence Report indicates that there are six primary schools located within Tiverton itself and these are largely accepting more students than their planned admission number. The development allocations will result in a need to provide additional primary education facilities. Additional secondary places will be required to accommodate the development proposed to be allocated in the emerging Local Plan	-2	Policy proposes the upgrading of the lane to 'Wynnard's Cottages' to provide the vehicular access point with widening of the frontage. The existing access to the house Wynnard's Mead to form a secondary access for pedestrians and cyclists. Policy	0

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	Review. Developer contributions will be required in order to fund these improvements. Given school capacity and site access issues a negative effect is considered.		S8 also provides mitigation by setting out that developers will be expected to contribute to, or bear the full cost of, new or improved infrastructure and facilities; overall a neutral effect is considered.	

Secondary/cumulative/synergistic effects:	The development overall will meet the housing needs of Tiverton including affordable housing.
Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Within the short term, construction traffic associated with the development will contribute towards traffic increase within the town. Once developed, development will be permanent. The development without appropriate mitigation will lead to a permanent damaging impact on the settings of Gotham (recently upgraded listed building to II*) and Wynnards Mead (heritage asset).
Spatial extent: (District wide / local)	This site option will help provide housing within Tiverton including for affordable housing. Development would be focussed in Tiverton, the largest town in the district. The provision of 70 dwellings will help meet the housing needs of the district as a whole.

**Alternative Option TIV14 Wynnards Mead: New information, reduced area**

In response to a request made by Historic England a Historic Environment Assessment (HEA) was undertaken which suggested an alternative option of not allocating the south west and south of the site to protect the setting of the grade II\* listed building (Gotham) and heritage asset

(Wynnards Mead). Taking this into account along with a representation from the Environment Agency a site of 1.2 hectares at Wynnards Mead, Bakers Hill could be allocated for residential development, subject to; 29 dwellings (28% affordable), design that minimises impact to landscape character and setting of the adjoining listed building and unlisted building (Wynnards Mead), upgrading the lane to provide vehicular access point and site contamination assessment with mitigation for the historic quarry.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	This site falls within the 'River valley slopes and combes' landscape character area. This area typically falls within the River Exe valley and often has steep, wooded sides and a strong sense of enclosure within a lush valley landscape. The site is elevated, and therefore is visible from a number of viewpoints, including Seven Crosses Road to the south. Accordingly, there would be some impact from development in this location, a negative effect.	-2	The site capacity has been reduced to 29 dwellings down from 70 dwellings to reflect site constraints. The policy requires design which minimises impact to the landscape character, overall a minor negative impact with this mitigation measure.	-1
B) Protection and promotion of a quality built and historic environment	The site, which lies to the west of Tiverton, consists of the grounds of a large house called 'Wynnards Mead', including some associated agricultural land and two cottages. Gotham adjoins the site to the west. The site is in close proximity to a listed building to the immediate west of the site. In response to a request made by Historic England a Historic Environment Assessment (HEA) was undertaken which suggested an alternative option of not allocating the south west and south of the site to protect the setting of the grade II* listed building	-1	Criteria within the policy requires design which protects the character and setting of the adjoining listed buildings and the unlisted house within the site 'Wynnards Mead'.	0

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	(Gotham) and heritage asset (Wynnards Mead). In considering the proposed alternative for the site it is considered that a slight negative impact would remain.			
C) Mitigating the effects of climate change	With the new information provided by the EA that a buffer of at least 7m around Cottey Brook is required to allow for future maintenance of the watercourse, the proposed alternative for the site no longer abuts the north side of Cottey Brook and therefore no longer falls within flood zone 3. However development could lead to increased surface water run-off, a slight negative effect remains.	-1	A policy requirement in the Local Plan Review seeks mitigation measures through the provision of Sustainable Urban Drainage Schemes to deal with surface water run-off and arrangements for future maintenance. On balance it is felt that development of this site would have a neutral effect.	0
D) Safeguarding and minimising resource use	The proposed alternative site is located on unclassified agricultural grade and a small area of contaminated land (historic quarry, 0.06ha in north). On balance development of this site would result a minor negative impact on this objective.	-1/?	Criteria in policy require site contamination assessment and remediation to mitigate risks associated with the historic quarry to the north of the site. Due to the partially known agricultural grade of land an unknown and slight negative impact would be considered.	-1/?

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
E) Promoting economic growth and employment	Site option does not result in the loss or gain of employment land, a neutral effect.	0		0
F) Supporting retail	The policy contains no retail proposals, however the high street would benefit from the custom of the residents from this development. There would be a minor positive effect.	+1		+1
G) Meeting housing needs	Option provides for 29 new dwellings a contribution towards future housing need including affordable housing, a positive effect.	+2		+2
H) Ensuring community health and wellbeing	The services and facilities of Tiverton lie some 1.2 km distant. The site is located within walking distance to Tiverton town centre and is close to a bus service into Tiverton.	+1		+1
I) Delivering the necessary infrastructure	An adequate site access is achievable however the existing carriageway and footway links to Tiverton are very steep. The Mid Devon Community Infrastructure Evidence Report indicates that there are six primary schools located within Tiverton itself and these are largely accepting more students than their planned admission number. The development allocations will result in a need to provide additional primary education facilities. Additional secondary places will be required to accommodate the development proposed to be allocated in the emerging Local Plan Review. Developer contributions will be required in order to fund	-2	Policy proposes the upgrading of the lane to provide the vehicular access point. Policy S8 also provides mitigation by setting out that developers will be expected to contribute to, or bear the full cost of, new or improved infrastructure and facilities; overall a neutral effect is considered.	0

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	these improvements. Given school capacity and site access issues a negative effect is considered.			

Secondary/cumulative/synergistic effects:	The development overall will meet the housing needs of Tiverton including affordable housing.
Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Within the short term, construction traffic associated with the development will contribute towards traffic increase within the town. Once developed, development will be permanent.
Spatial extent: (District wide / local)	This site option will help provide housing within Tiverton including for affordable housing. Development would be focussed in Tiverton, the largest town in the district. The provision of 29 dwellings will help meet the housing needs of the district as a whole.

**Alternative Option New Site Tiverton- Seven Crosses Hill**

Land with a gross site area of 7.69ha at Seven Crosses hill, Tiverton for 184 dwellings.

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
A) Protection of the natural environment	The site lies adjacent to the designated town of Tiverton (under existing planning policy), outside but adjoining the settlement limit. The majority of this site falls within the 'River valley slopes and combes' landscape character area which typically falls within the River Exe Valley and often has steep, wooded sides and a	-2	Policy S9 'Environment' and DM1 'High Quality Design' in the Local Plan Review would provide some mitigation and therefore a slight negative	-1

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>strong sense of enclosure within a lush valley landscape. The southern part of the site falls within the 'Upper farmed and wooded valley slopes' landscape character area which is typified as having a steeply rolling landform, being a lush and fertile land which gives rise to extensive tracts of medium scale fields of permanent pasture. The site is very open from the northern direction whereby the surrounding skylines consist of expansive views of Tiverton and the surrounding countryside. There are no European wildlife sites or SSSIs in close proximity but the site does contain an area of woodland approximately 0.56ha in size which is a priority habitat. As development would be very prominent within the landscape, a negative effect is considered.</p>		<p>effect is considered. Further mitigation would be provided if development was focused on the northern part of the site only. This section would not have such a significant impact on landscape character and would have a better relationship to the existing settlement limit.</p>	
<p>B) Protection and promotion of a quality built and historic environment</p>	<p>There are no listed buildings located in close proximity. This proposed development site occupies a prominent position in the landscape where prehistoric activity is recorded in the County Historic Environment Record on similar topographic sites. An overall slight negative and uncertain effect is considered.</p>	<p>-1/?</p>	<p>Local Plan Review policy DM25 would provide some mitigation by requiring that any planning application include sufficient information to enable a description of a heritage asset affected and a consideration of the impact of development upon it. Based on information from Devon County Council this may take the form of 1) an</p>	<p>0/?</p>

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			archaeological geophysical survey and 2) a programme of intrusive archaeological investigation of areas that would be affected by development here. Overall a neutral effect although this remains uncertain as the impact depends on the results of the investigation.	
C) Mitigating the effects of climate change	The site is located in flood zone 1 the lowest level of flood risk however there is an ordinary watercourse on the eastern site boundary. Surface water run-off would increase without appropriate mitigation measures. Overall a slight negative and uncertain effect.	-1/?	A policy requirement in the Local Plan Review seeks mitigation measures through the provision of Sustainable Urban Drainage Schemes to deal with surface water run-off and arrangements for future maintenance. A Flood Risk Assessment would be required to determine the impact of the ordinary watercourse. If development avoided areas of flood risk this would mitigate	0/?



<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
			any impact. Overall a neutral and uncertain effect given as the effect of the ordinary watercourse is not yet known.	
D) Safeguarding and minimising resource use	Development is located on a greenfield site which is grade 3 good / moderate agricultural land, a slight negative effect.	-1		-1
E) Promoting economic growth and employment	Site option does not result in the loss or gain of employment land. Development of this scale would be a boost to local construction firms and associated trades who would benefit from being able to undertake contract work on the site. There would therefore be a slight positive impact.	+1		+1
F) Supporting retail	This option proposes a large scale residential development within a town. The policy contains no retail proposals, however the high street would benefit from the custom of residents from this development. There would be a positive effect.	+2		+2
G) Meeting housing needs	Option provides for 184 new dwellings contributing towards future housing needs, a significant positive effect.	+3		+3
H) Ensuring community health and	Tiverton is a designated town under policy S10; it has numerous services as outlined in S10 and is considered appropriate for development. Services/facilities in the town centre are within	+1		+1

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
wellbeing	walking distance. Overall a slight positive effect.			
I) Delivering the necessary infrastructure	<p>The Mid Devon Community Infrastructure Evidence Report indicates that there are six primary schools located within Tiverton itself and these are largely accepting more students than their planned admission number. The development allocations will result in a need to provide additional primary education facilities. Additional secondary places will be required to accommodate the development proposed to be allocated in the emerging Local Plan Review. Developer contributions will be required to fund these improvements. Access is a concern as the delivery of an appropriate estate road would be difficult given the challenging topography of the site. The site would require a number of accesses from Seven Crosses Road all of which would necessitate significant excavation. Given the constraints to site access and educational capacity an overall negative effect is considered.</p>	-2	<p>Policy S8 would provide some mitigation by setting out that developers would be expected to contribute to, or bear the full cost of new or improved infrastructure and facilities although the impact remains uncertain given the limited capacity for the primary schools to expand within their current sites. Although access is achievable, work would require significant excavation and would constrain the delivery of the expected yield. Overall a slight negative and uncertain effect is considered given the access constraints and the uncertainty around the limited capacity of the school to expand.</p>	-1/?

Secondary/cumulative/synergistic effects:	The cumulative impacts of the development of this site have the potential to impact upon traffic, put pressure on services and facilities and the current provision of infrastructure. Development of this site could lead to overcapacity issues in local schools.
Temporary/permanent effects :Timescale: Short (1-5 years), Medium (6-15 years), Long (15+ years)	Within the short term, construction traffic associated with the development will increase traffic along Seven Crosses Road, Tiverton. Once completed the development will be permanent.
Spatial extent: (District wide/local)	This site option will help meet housing needs.

## Additional Appraisals for Cullompton allocations

### Alternative Option CU1-6: North West Cullompton including Growen Farm full allocation

A site of 106 hectares to the North West of Cullompton is allocated for mixed use development subject to; 1520 dwellings (28% affordable), 5 pitches for gypsies and travellers, extra care housing, 5% of housing to be serviced plots for self-build, 21,000 sqm of commercial floor space including retirement complex, hotel and leisure, 28 hectares of green infrastructure, road linking Tiverton Road to Willand Road, environmental protection, community facilities including primary school, Carbon reduction and air quality improvements, phasing strategy and master planning exercise. Policies CU2-6 provide further detail.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	<p>There are a number of protected trees and hedgerows within the site, along field boundaries. This site falls within the 'Lower rolling farmed and settled valley slopes' landscape character area. This area is typified by having a gently rolling and strongly undulating landscape which is intensively farmed. The landscape is undulating, with the higher parts more sensitive to change and development. Developing this area will extend the built up area of the town, from an agricultural landscape, which will be a significant change. However, the visibility from elsewhere varies across the site. The more elevated parts of the site (such as St Andrews Hill and Rull Hill) are more sensitive to development because of their visibility in the landscape (particularly on north and west facing slopes).</p> <p>The Landscape and Visual Appraisal concludes that development</p>	-3	The policy requires 'environmental protection and enhancement' which will help mitigate the impact on this objective however the level of development on the site will still have an impact on the character of the area. CU3 sets out these measures in detail including; the protection and strengthening of trees and other features, maintaining wildlife networks, 28 ha of green infrastructure, providing	-2

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>of the land will extend Cullompton into the open countryside beyond Rull Hill which currently acts as a strong threshold in the landscape which will largely separate the site from adjacent proposed development. Opportunities for development are limited on the site, and should development proceed, it should be limited to the eastern part of the southern field, adjacent to the proposed development to the east. The northern four fields are not suitable for development.</p> <p>Given some parts of the Growen Farm site are sensitive to change and development, overall a significant negative effect is anticipated.</p>		<p>public open space and allotments, strategic landscaping and measures to protect the biodiversity. However given the findings of the 2014 Landscape and Visual Appraisal on Strategic Site Options report identified the northern four fields are not suitable for development a negative effect remains.</p>	
B) Protection and promotion of a quality built and historic environment	<p>The site adjoins a roman fort on St Andrew's Hill (a scheduled ancient monument). There are a number of listed buildings within the cemetery and farmyards adjoining the site which would need to be considered when designing the development. The site lies in an area of high archaeological potential to the north of the Roman fort at St Andrew's Hill and contains evidence of prehistoric activity identified through aerial photography and findspots of flint tools. Recent archaeological investigations in this area have demonstrated the presence of extensive and significant prehistoric and Romano-British sites.</p>	-2/?	<p>Criteria within the supporting policy CU3 seek mitigation measures through archaeological investigation, a slight negative effect. The policy requires a public Masterplanning exercise to be undertaken before any planning application is made and which will improve the quality of the final design of the development. Overall a</p>	-1/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			slight negative effect.	
C) Mitigating the effects of climate change	<p>The site is largely located in Flood zone 1 the lowest risk to flooding. However there are unnamed watercourses flowing through parts of the site for which flood zone information is not yet known. The northern edge is adjacent to flood zone 3a, which is associated with a watercourse which runs west-east, a potentially slight negative impact. The layout of the development will need to take this into account with a potential buffer zone. Areas of floodplain should be retained as part of the strategic green infrastructure. The Flood Map for Surface Water shows a low risk of flooding from surface water in most areas. Any development must be accompanied by a suitable drainage strategy to deal with existing surface water flows and any potential increase in surface runoff a slight negative impact. The site has increased in size, which has led to more of the northern boundary being adjacent to flood zones 2 and 3. Criteria within the policy seek carbon reduction and air quality improvements, this is required to minimise the overall carbon footprint of the development and ensure the impact of the site on air quality is acceptable, a slight positive effect. One Critical Drainage Area is identified at Cullompton. A Flood Risk Assessment will be required at the planning application stage to determine specific recommendations for mitigation. Taking into account flood risk</p>	-1/?	<p>Criteria within the policy seek mitigation measures through environmental protection and enhancement. Built development is entirely in flood zone 1 and CU3 seeks SUDs to deal with surface water run-off. The policy requires carbon reduction and air quality improvements and will help mitigate the effects of climate change. This will help minimise the overall carbon footprint of the development. A Flood Risk Assessment would be required to determine the impact of the unnamed watercourses. If development avoided areas of flood risk this would mitigate any impact. Policy S11 Cullompton supporting text</p>	+1/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	and climate change an overall minor negative and uncertain effect is considered.		acknowledges the Critical Drainage Area at Cullompton which provides mitigation. Taking into account flood risk and mitigation measures for climate change an overall slight positive effect is considered. Uncertainty remains as the impact of the unnamed watercourse is not yet known.	
D) Safeguarding and minimising resource use	Development option is located on greenfield land. Approximately 70% of the site is located on Grade 1 agricultural land of the highest quality, with the remainder located on Grade 4, poor quality agricultural land. Grade 1 agricultural land in Mid Devon amounts to 32.4 square kilometres, only 3.5% of the district. Given the loss of the highest grade agricultural land, a significant negative effect is considered.	-3		-3
E) Promoting economic growth and employment	Policy provides 21,000 sqm of commercial floorspace reflecting helping to diversify the economy and encourage inward investment. Development of this scale would be a boost to local construction firms and associated trades who would benefit from being able to undertake contract work on the site. Providing	+3		+3

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
	employment sites near where to people live would provide the opportunity to reduce out-commuting, levels of which are high within the district. There would therefore be a significant positive impact.			
F) Supporting retail	The policy contains no specific retail proposals although these proposals could form part of the Commercial allocation. Though the high street and supermarket are not within easy walking distance of all parts of the site, it is still anticipated that they would benefit from the custom of the residents from this development. Therefore a positive impact has been assumed.	+2		+2
G) Meeting housing needs	The option would provide for a significant proportion of the housing needs within the district, overall a significant positive impact.	+3		+3
H) Ensuring community health and wellbeing	The option will have an impact on Cullompton Air Quality Management area which will require some mitigation. The existing site allocation for North West Cullompton includes the provision of a road linking Tiverton Road to Willand Road. This, along with delivery of the Town Centre Relief Road, is intended to significantly reduce the amount of traffic in the town centre. This should in turn improve the air quality and town centre vitality (as it would direct traffic away from the high street) and is at the heart of the long term development strategy for Cullompton. The Renewable Energy, Carbon Reduction and Air Quality study	+2	CU5 makes note of carbon reduction and air quality improvements which will help minimise pollution and benefit community health and wellbeing including use of low emission strategies. CU3 makes provision for areas of equipped and laid out public open space including	+2



Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>(2014) reiterates that North West Cullompton alongside East Cullompton are likely to result in the largest change in local air quality as both developments are large in size. Development in Cullompton will increase pollution concentrations as a result of additional traffic using the local road network; however the existing allocation for a Town Centre relief road linking Station Road and Meadow Lane is particularly important for air quality. There is a medical centre located adjacent to the east side of the northern element of the site and a number of rights of way/bridleways run through the site.</p>		<p>children’s play, sports pitches and allotments as well as strategic green infrastructure including park land, open space and local nature reserve. The policy also promotes the delivery of community facilities to meet local needs arising and transport provision to ensure appropriate accessibility for all modes. This suggests that opportunities for sustainable forms of travel may arise.</p>	
<p>l) Delivering the necessary infrastructure</p>	<p>The policy requires an agreed phasing strategy to bring forward development and infrastructure in step and retain the overall viability of development. There are potential highway capacity issues around this site which would require enhancements, for example, to M5 J28 before this site is developed. The policy requires masterplanning to take place to ensure that the necessary infrastructure is delivered at a rate to support the additional development without placing unacceptable demands on existing capacity. A road link between Tiverton Road and</p>	<p>+2</p>	<p>CU6 includes an agreed phasing strategy to bring forward development and infrastructure in step and retain the overall viability of development. CU3 includes the provision of Green Infrastructure. CU2 sets out agreed transport provision</p>	<p>+2</p>

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>Willand Road will be delivered as part of bringing the site forward, whilst the site will contribute towards the cost of the Town Centre Relief Road, a key element of local infrastructure. The Mid Devon Community Infrastructure Evidence Report indicates that there is a pressing need for new primary places in Cullompton. The two schools in the town, St Andrews and Willowbank currently accept more pupils than their planned admission number for the size of school and facilities available there. There are two secondary schools located within this Local Learning Community, including Cullompton Community College which currently has 283 places spare capacity and Uffculme School, which currently admits 113 pupils more than its planned admission number. It will therefore be necessary to expand the secondary schools in the Local Learning community to provide roughly 334 places. Part of the site is close to St. Andrew's Primary School; however the quantum of development will require an additional school to be built to meet identified need. Overall, provision of the necessary infrastructure, is considered a positive impact arising from the policy.</p>		<p>including provision of a network of streets linking to the existing highway network, including a through route suitable for buses linking Tiverton Road to Willand Road; bus enhancements and pedestrian routes. CU4 makes provision for a primary school and contributions towards early years and youth support services. The site is therefore likely to deliver the necessary infrastructure for the site which may also benefit the surrounding community.</p>	

Secondary/cumulative/synergistic effects:	The cumulative impacts of the development of this site and the other possible options in the plan within Cullompton have the potential to impact upon traffic, put pressure on services and facilities. Development could contribute towards
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	<p>traffic in the town with consequential impact on air quality within the town centre. Additional primary school capacity will be needed to accommodate the developments. This would be most suitably provided through a new school at the North-West Cullompton site and a new primary school or schools within the East of Cullompton allocation. Additional secondary school capacity will need to be undertaken in consideration of the aspirations of the local schools and communities.</p>
<p>Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)</p>	<p>Within the short term, construction traffic associated with the development will contribute towards traffic increase within the town. The estimated development time of the site is approximately 15 years. Once completed the development will be permanent.</p>
<p>Spatial extent: (District wide / local)</p>	<p>This site option will significantly help provide housing for the district. Development would be focussed as an extension to the second town in the district.</p>

**Alternative Option CU7-12: East Cullompton Aller Barton Farm and land south of Honiton Road**

A site of 181 hectares to the east of Cullompton is proposed for mixed use development, subject to; 2,100 dwellings during the plan period and 500 dwellings post 2033 including, 28% affordable, extra care housing, 5% to be serviced plots for self-build, at least 10 gypsy and traveller pitches, 20,000 square metres mixed commercial floor space during the plan period and 12,000sqm post 2033, 40ha of green infrastructure comprising mixed open space, sports pitches, allotments and natural habitats, new or improved access and egress onto the M5 motorway and pedestrian and cycle links to the town centre, environmental protection, assessment of land contamination, community facilities, carbon reduction and air quality improvements, phasing strategy and masterplanning.

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
A) Protection of the natural environment	<p>The site falls within the 'Lowland Plains' landscape character area which is typified as being an open, low lying flat landscape which is agriculturally prosperous. The site is large and predominately flat towards the south west but undulating at the north eastern extent of the site. The landscape of the surrounding area is also largely flat, offering limited views into the site other than towards the south west where there are views out towards the surrounding countryside and agricultural lands. However, given the scale of the site, there may well be variations in topography. The site encompasses part of Allerwood which is lowland mixed deciduous woodland. Much of this wood has been replanted with larch and the ground flora is of particular interest. There is also a rare species designation: Primrose '<i>Primula vulgaris</i>' located within the site. Although the site is largely flat offering limited views and fields are of a low wildlife value, the scale of the site is still considered to have a negative effect to wildlife and biodiversity and therefore, a negative effect is considered. This site has not had the benefit of a landscape and visual appraisal as the other strategic site options have, as such an uncertain effect is also considered.</p>	-2/?	<p>The policy requires 'environmental protection and enhancement' which will help mitigate the impact on this objective however the level of development on the site will have an impact on the character of the area. Policy should set out these measures in detail including the protection and strengthening of trees and other features, maintaining wildlife networks, providing public open space and allotments, strategic landscaping and green infrastructure including park land and open space. Overall a slight negative and uncertain effect given that the site has not had the benefit of a landscape and visual appraisal as other strategic site options</p>	-1/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			have.	
B) Protection and promotion of a quality built and historic environment	<p>There are a number of listed buildings located close by but not within the proposed site boundary. These include the Grade II listed Maddock’s Farmhouse, the Grade II listed Aller restaurant and the farm buildings arranged around a farmyard 20m south east of Aller restaurant. The site occupies a significant area within a landscape that has evidence of prehistoric and Roman activity recorded in the County Historic Environmental Record. To the west, recent archaeological work has demonstrated the presence of prehistoric and Roman settlement in and around Cullompton. While no such sites are recorded within the area under consideration (though this may just reflect the absence of any formal archaeological work in this area) the Historic Environment Team would regard, due to the area of the proposed allocation and the known prehistoric and Roman activity in the wider landscape, that there is potential for the site to contain archaeological deposits associated with the known prehistoric and Roman activity in the vicinity. The Historic Environment Team would therefore advise the results of an appropriate programme of archaeological work to allow the archaeological potential of the site to be understood along with the impact of any development upon the heritage assets in the site. This would be in accordance with Local and National policy on planning and the</p>	-3/?	<p>Policy should seek detailed archaeological investigation and measures to record and protect archaeological interest. Overall a neutral effect, although this remains uncertain as the effects will depend on the results of the investigation. The policy requires a public masterplanning exercise to be undertaken before any planning application is made to ensure the quality of the final design of the development. The adopted masterplan will help to minimise the impact on the built and historic environment through good design. However given the separation of the site from existing development to</p>	-2/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>historic environment. There is potential for minor negative impacts on heritage until more information is known. Given the potential impact on archaeological potential, a slight negative and uncertain effect is considered. The site option itself is divorced from existing development. The separation of the site from the existing development to the west raises concerns about how well the final design could integrate the existing and proposed development. Furthermore the shape of the proposed site would be an illogical and unusual extension to the built environment. Overall a significant negative effect when combined with the possible impact on archaeological potential, although the archaeological element is uncertain.</p>		<p>the west, and the unusual shape of the development forming an illogical extension to the built environment it is considered that limited mitigation can be provided to ensure the final design is integrated with existing development, therefore overall an overall negative although uncertain effect remains.</p>	
<p>C) Mitigating the effects of climate change</p>	<p>Significant areas to the west of the site are within Flood zones 2 and 3. An array of ordinary watercourses passes through the site, some of which have been culverted. There are significant areas of surface water flooding risk across the site, particularly concentrated around all watercourses. These include concentrated areas of surface water flood risk to the north of Allerwood, extending to the west and along the north-west boundary of the site and high risk regions particularly prevalent to the north-west. There have been two historical fluvial flooding incidents close to the site, just outside of the northerly and southerly boundaries. Reference should be made to Devon</p>	<p>-3/?</p>	<p>Criteria within the policy seek mitigation measures through retention of land in the floodplain as informal amenity open space. The policy requires carbon reduction and air quality improvements and will help mitigate the effects of climate change. Policy S11 Cullompton supporting text acknowledges the Critical</p>	<p>0/?</p>

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
	County Council's draft SuDS Design Guidance. Surface water from this development will be managed in a way which provides benefits to water quantity, water quality, public amenity and biodiversity. This site will also have an impact on the Cullompton Air Quality Management Area. Given the historical fluvial flooding incidents close to the site and the potential impacts on the Cullompton Air Quality Management Area and the uncertainty associated with the effects of the ordinary watercourses present within the site, a significant negative and uncertain effect is considered.		Drainage Area at Cullompton which provides mitigation. Taking into account flood risk and mitigation measure for climate change an overall neutral effect is considered but this remains uncertain given that the potential effects of the ordinary watercourses remain unknown.	
D) Safeguarding and minimising resource use	Development option is located on grade 3 greenfield land. Given the significant loss of grade 3 agricultural land, a negative effect is considered.	-2		-2
E) Promoting economic growth and employment	There are a number of farms which could be incorporated into the site, or replaced with other employment units as part of a mixed use approach for the whole site. The policy seeks the provision of 20,000 square metres of mixed commercial floor space during the plan period and 12,000 sqm post 2033, bringing with it a large number of jobs into the town. Development of this scale would be a boost to local construction firms and associated trades who would benefit from being able to undertake contract work on the site. There would be a significant positive impact.	+3		+3

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
F) Supporting retail	The scale of residential development in this location near to the town centre is considered a slight positive effect for town centre viability. As the percentage of retail within the sites commercial element is uncertain, an unknown is also considered.	+1/?	Criteria in the policy state that this is subject to impact assessment which demonstrates no adverse impacts on existing retail uses within Cullompton Town Centre, an overall slight positive effect. An unknown is recorded until the retail impact has been assessed.	+1/?
G) Meeting housing needs	Option will provide for a significant proportion of new dwellings during the plan period including an affordable housing contribution towards future housing need, a significant positive effect. The mix of dwellings to be achieved on the site will be tailored to achieve the appropriate balance and will provide gypsy and traveller sites, extra care housing and service plots for self-build. Given the site is of such a scale to generate a critical mass of self-sustaining development and the option significantly contributes towards housing development an overall significant positive effect is considered.	+3		+3
H) Ensuring community health and	The site is located some distance from the town centre and remote from Cullompton town services/facilities. Option will contribute towards light and noise pollution, a slight negative	-3	Policy should make note of carbon reduction and air quality improvements which	-1/?



Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
wellbeing	<p>effect. The Renewable Energy, Carbon Reduction and Air Quality Study (2014) reiterates that North West Cullompton alongside East Cullompton are likely to result in the largest change in local air quality as both developments are large in size. Development in Cullompton will increase pollution concentrations as a result of additional traffic using the local road network; however the existing allocation for a Town Centre relief road linking Station Road and Meadow Land is particularly important for air quality. In balancing the distance of the development from the town centre, the lack of services and the corresponding light, noise and air pollution, an overall significant negative effect is considered.</p>		<p>will help minimise pollution and benefit community health and wellbeing. CU9 makes provision for areas of equipped and laid out public open space including children’s play, sports pitches and allotments as well as strategic green infrastructure including park land, open space and local nature reserve. Criteria within the policy seek provision of a dedicated pedestrian and cycle route to the town centre. The policy also promotes the delivery of community facilities to meet local needs arising and transport provision to ensure appropriate accessibility for all modes. This suggests that opportunities for sustainable forms of travel may arise.</p>	

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			However given the unusual shape of the site and separation from existing development with access to Honiton Road only to the east of the site, the provision of accessible forms to travel may not easily be provided. An overall slight negative and uncertain effect.	
l) Delivering the necessary infrastructure	The policy will require an agreed phasing strategy to bring forward development and infrastructure in step and retain the overall viability of development. There are potential highway capacity issues around this site which would require enhancements, for example, to M5 J28 before this site is developed. A development in this location and of the size proposed would have significant implications for the operation of J28 and the M5 mainline. The junction already operates at capacity at times with queues on the off-slips extending back onto the M5 mainline. Consideration would also have to be given to the ability of the M5 mainline to accommodate the forecast traffic flows and measures identified, if necessary, to ensure that demand for traffic movements along the M5 remains within the	-3	The policy will include a phasing strategy to bring forward development and infrastructure in step and retain the overall viability of development. The policy will include the provision of Green Infrastructure. CU8 sets out agreed transport provision including; Provision of mitigation measures to ensure only acceptable impacts occur to J28 of the M5 as a result of	+2/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>capacity of the mainline to accommodate it. The site is of a sufficient scale for infrastructure improvements to be necessary within and outside of the site. Criteria within the policy will seek transport provision to ensure appropriate accessibility for all modes, improvements to Junction 28 of the M5 motorway and provision of a dedicated pedestrian and cycle route to the town centre. Given the capacity limitations for junction 28 of the M5; traffic implications for the Honiton Road and lead in time for delivery of a large urban extension against proposed mitigation measures a significant negative effect is considered until appropriate studies / modelling work can confirm that access can be achieved and suitable junctions designed. The size of the development would also need considerable planning and design works and criteria within the policy should seek a phasing strategy and public masterplanning exercise. The unusual shape of the proposed site would result in access from the main Honiton Road only available to the East of the site, the furthest area of the site to existing development to the West. The primary schools will have limited spare capacity to support future development and are on constrained sites and not easily expanded. A development of this scale is likely to generate approximately 1200 primary age pupils, requiring the provision of new primary provision within the development site. Potentially,</p>		<p>traffic generated from the site;  Provision of appropriate highway improvements on roads around the development to ensure an unacceptable traffic impacts are mitigated;  Provision of a network of streets linking to the existing highway network, and appropriate mitigation to reduce impacts on the existing road network such as Honiton Road; Sustainable modes of transport are also supported. The policy should make provision for a primary school and contributions towards secondary school places. The site is therefore likely to deliver the necessary infrastructure for the site which may also benefit the surrounding community.</p>	

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	this would require two sites of between 2.ha and 2.9ha each (including nursery provision). The secondary school is at capacity and will need to be expanded to support increased children in an around the area. Overall a significant negative effect.		However this is uncertain given the unusual shape of the site only allowing access from the east of the site which calls into question how well the site will be integrated with existing infrastructure.	

Secondary/cumulative/synergistic effects:	The cumulative impacts of the development of this site has the potential to impact upon the traffic, put pressure on services and facilities and the current provision of infrastructure should be mitigated by the policy and supplementary policies which are promoted in the supporting text. Development could contribute towards traffic in the town with consequential impact on air quality within the town centre and capacity issues at Junction 28 of the M5 however the policy will require mitigation for these impacts. Overall the development of this site will help meet the housing needs of Cullompton and the district as a whole. Additional primary school capacity will be needed to accommodate the developments. This would be most suitably provided through a new primary school at the North-West Cullompton site and a new primary school or schools providing within the East of Cullompton allocation. Additional secondary school capacity will need to be undertaken in consideration of the aspirations of the local schools and communities. The Renewable Energy, Carbon Reduction and Air Quality study (2014) recognises benefits with locating strategic development within a single location in carbon reduction terms.
Temporary/permanent effects: Timescale: Short	Development will occur during the later period of the plan, and then will continue

(1-5 years), Medium (6-15 years), Long (15+ years)	throughout the remaining lifetime, (therefore likely to only be taking place in the long-term). Once developed, the effects will be permanent.
Spatial extent: (District wide/local)	The policy set seeks to meet the development needs of the whole district.

***Alternative Option CU21: Land at Colebrook, larger site 19.3ha 400 dwellings***

A site of 19.3 ha is proposed for residential development, subject to; 400 dwellings. The development shall not commence until the Town Centre relief road has been provided, upgrading of Colebrook Lane to accommodate additional traffic and two points of access from Siskins Chase, green infrastructure and retention of the land in the flood plain for open space, environmental measures, archaeological investigation, transport assessment and air quality improvements.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	The central band of the site falls within the ‘Sparsely settled farmed valley floors’ landscape character area. This area is typified by the presence of rivers or streams and related flat or gently sloping valley bottoms within the low lying areas of the district. The north and south portions of the site falls within the ‘Lower rolling farmed and settled valley slopes’ landscape character area. This area is typified by having a gently rolling and strongly undulating landscape which is intensively farmed. The site is reasonably enclosed to Colebrook Lane and is part of a rolling landscape. There is limited wider landscape impact, but a more localised impact if the site is developed. Given the scale of development a negative effect is considered.	-2	Policy S9 ‘Environment’ and DM1 ‘High Quality Design’ in the Local Plan Review would provide some mitigation. Criteria within the policy seek measures to protect and strengthen environmental features which contribute towards the character and biodiversity of the surrounding countryside and mitigation through the provision of green infrastructure including the	-1

			protection of amenity local space. Given the above mitigation measures, but the potential impacts on landscape, a slight negative effect is considered.	
B) Protection and promotion of a quality built and historic environment	The site occupies a large area in a landscape with evidence of prehistoric and Roman activity in the vicinity. Any planning application for development here will need to be supported by the results of an appropriate level of archaeological works to allow the significance of the heritage asset to be understood along with the impact of the development upon it. An overall slight negative and uncertain effect is considered.	-1/?	Criteria within the policy seek mitigation through archaeological mitigation.	0/?
C) Mitigating the effects of climate change	Kia Ora Farm and fishing lakes to the west of the site. The Cole Brook runs from the east circling the bottom half of the site, and then parallel to boundary (on south east side). Approximately 1.6 ha of the site lies within Flood Zone 2 & 3 and 1 ha of the site lies within the functional floodplain. The remainder of the site (16.7ha) lies within Flood Zone 1. One Critical Drainage Area is identified at Cullompton. A Flood Risk Assessment will be required at the planning application stage to determine specific recommendations for mitigation. However, Cullompton is well served by a local and wider bus service which could help reduce car travel and therefore carbon emissions. Taking into account flood risk but the provision of a regular bus service an overall negative effect is considered.	-2	Criteria within the policy seek mitigation measures through retention of land in the floodplain as informal amenity open space. A policy requirement in the Local Plan Review seeks mitigation through the provision of Sustainable Urban Drainage Systems to deal with surface water run-off and arrangements for future	+1

			<p>maintenance. Policy S11 Cullompton supporting text acknowledges the Critical Drainage Area at Cullompton and provides mitigation. Criteria within the policy seek carbon reduction and air quality improvements, this is required to minimise the overall carbon footprint of the development and ensure the impact of the site on air quality is acceptable, a slight positive effect.</p>	
D) Safeguarding and minimising resource use	<p>Development option is located on greenfield land which would be lost if this site is developed. Policy would result in the loss of 0.2 ha of grade 1 excellent quality agricultural land, 14.8 ha of grade 2 very good quality agricultural land and 4.3ha of good to moderate quality agricultural land. Overall a negative effect is considered.</p>	-2		-2
E) Promoting economic growth and employment	<p>Site does not result in a loss or gain of employment land. Development of this scale may be a boost to local construction firms and associated trades who would benefit from being able to undertake contract work on the site. There would therefore be some positive impact.</p>	+1		+1
F) Supporting	<p>Option is located some distance from the town centre. The policy</p>	+2		+2

retail	contains no retail proposals, however the high street could benefit from the custom of the residents from this development. Given the scale of development within a town, a positive effect is considered.			
G) Meeting housing needs	Option provides for 400 new dwellings of which 28% should be affordable a contribution towards future housing need, a significant positive effect.	+3		+3
H) Ensuring community health and wellbeing	Cullompton is a designated town under policy S11; it has numerous services as outlined in S11 and is considered appropriate for development. The site is located some distance from the town centre. The option will have some impact on Cullompton Air Quality Management area which will require some mitigation. The option could contribute towards light and noise pollution, a slight negative effect. The site includes 1.1ha of informal open space, allowing opportunities for outdoor play. Balancing all factors, a slight negative impact is considered overall.	-1	Criteria in the policy require the implementation of a Transport Plan and other measures to minimise carbon footprints and air quality impacts. Policy S11 seeks to continue providing measures to support the implementation of the Cullompton Air Quality Action Plan including new highways links to relieve the town centre and enhance walking and cycling opportunities around the town. Overall, a neutral effect is considered.	0



I) Delivering the necessary infrastructure	The width of Colebrook Lane from Swallow Way may present difficulties with access and would need to be substantially upgraded. Development in this location would increase traffic on Tiverton Road, so would not be permissible until a new link road linking Tiverton Road to Willand Road has been provided under Policy CU1. The requirements for a transport assessment are an uncertain effect. The Mid Devon Community Infrastructure Evidence Report indicates that there is a pressing need for new primary places in Cullompton. The two schools in the town, St Andrews and Willowbank currently accept more pupils than their planned admission number for the size of the school and facilities available there. There are two secondary schools located within this Local Learning Community, including Cullompton Community College which currently has 283 places spare capacity and Uffculme School, which currently admits 113 pupils more than its planned admission number. It will therefore be necessary to expand the secondary schools in the Local Learning community.	-2	Some mitigation may be provided through seeking appropriate access points and ensuring development does not take place until the Town Centre Relief Road has been required however given the scale of this scenario, the full allocation would be significant enough to affect the wider local road network and therefore a negative effect is considered.	-2
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Secondary/cumulative/synergistic effects:	The cumulative impact of the development of this site has the potential to impact upon traffic congestion and associated air quality issues. Development of the site in combination with other development in the local area could cumulatively lead to overcapacity issues in the local schools however other policies in the plan propose additional primary schools within Cullompton.
Temporary/permanent effects :Timescale: Short	Within the short term, construction traffic associated with the development may

(1-5 years), Medium (6-15 years), Long (15+ years)	exacerbate traffic problems in Cullompton however the site will only come forward following the completion of the North West Cullompton through route linking Tiverton Road to Willand Road. Once completed the development will be permanent.
Spatial extent: (District wide/local)	This site option will help meet housing needs.

***Alternative Option New Site Cullompton – Tiverton Road***

Land with a gross site area of 0.54 ha at Tiverton Road, Cullompton is proposed for 16 dwellings.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	The site falls within the ‘main cities and towns’ and the ‘lower rolling farmed and settled valley slopes’ landscape character areas. Development of the site is unlikely to have any negative impact on biodiversity. The site is located within the existing settlement limit for Cullompton and is screened by surrounding development and therefore there is likely to be no impact on landscape character. Overall a neutral effect.	0	Policy S9 ‘Environment’ and DM1 ‘High Quality Design’ in the Local Plan Review could potentially provide an improvement given that the site is currently a brownfield site. Therefore, a slight positive effect is considered.	+1
B) Protection and promotion of a quality built and historic environment	There are no listed buildings located in close proximity. This proposed development site lies to the west of an area where previous archaeological work has exposed evidence of Neolithic activity as well as Iron Age and Romano-British activity. Similar heritage assets are likely to extend into the area under consideration here. An overall slight negative and uncertain effect is considered.	-1/?	If the policy requires archaeological investigations and appropriate mitigation measures, overall a neutral effect although this remains uncertain as the impact will depend on the results of the	0/?

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
			investigation.	
C) Mitigating the effects of climate change	The site falls within the Cullompton Critical Drainage Area as defined by the Environment although it is also in the lowest flood risk zone 1. There could be risk of additional development here increasing the risk of flood risk. Overall a negative effect is considered.	-2	A policy requirement in the Local Plan Review seeks the provision of a sustainable urban drainage scheme to deal with all surface water from the development. Policy S11 Cullompton supporting text acknowledges the Critical Drainage Area at Cullompton which provides mitigation, overall a neutral effect is considered given the mitigation.	0
D) Safeguarding and minimising resource use	This site is located on previously developed land. A positive effect.	+2		+2
E) Promoting economic growth and employment	No impact	0		0

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
F) Supporting retail	No impact	0		0
G) Meeting housing needs	Option provides for 16 new dwellings contributing towards future housing needs, a slight positive effect.	+1		+1
H) Ensuring community health and wellbeing	Development of the site would result in the loss of a Place of Public Worship. There could be an impact on Cullompton Air Quality Management Area which will require some mitigation. Considering the loss of community facility and the potential impact on air quality, overall a significant negative effect is considered.	-3	If mitigation is provided for air quality impacts in the policy. If relocation of the local community facility is provided a neutral effect is considered, however this is uncertain as although the promoter suggests the redevelopment would not result in the loss of a local community facility as a new better site is preferable in a better location for congregation, the promoter has not given sufficient detail to be certain of this provision. As such a neutral although uncertain effect is considered.	0/?
I) Delivering the	The site is within St Andrews' designated area. This school has no	0/?		0/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
necessary infrastructure	<p>spare capacity and is on a constrained site, limiting potential for expansion. The site is adjacent to a large development site, which would include a primary school. Primary school capacity for this site is likely to be available within the proposed primary school. Cullompton Community College currently has some spare capacity and could be expanded if additional land is secured. The site has two clear potential access routes, one adjacent to the substation and one coming through Olympian Way. Given that there are two suitable access options and that there is likely to be capacity within the new proposed primary school a neutral and uncertain effect is considered as there are various elements to school capacity that are unknown e.g. provision of new primary school on adjacent site, in-sync with the development proposed on this site.</p>			

Secondary/cumulative/synergistic effects:	<p>The cumulative impact of the development of this site has the potential to impact upon traffic congestion and associated air quality issues. Development of the site in combination with other development in the local area could cumulatively lead to overcapacity issues in the local schools however new primary schools are proposed within other allocations for Cullompton.</p>
Temporary/permanent effects :Timescale: Short (1-5 years), Medium (6-15 years), Long (15+ years)	<p>Within the short term, construction traffic associated with the development may exacerbate traffic problems in Cullompton. Once completed the development will be permanent.</p>

Spatial extent: (District wide/local)	This site option will help meet housing needs.
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### **Land at Junction 27**

#### **Additional Appraisals for Land at Junction 17**

#### **Preferred Option J27 – Policy J27 – Land at Junction 27 of the M5 Motorway: 71ha mixed commercial floorspace**

A site of 71 hectares between M5 Junction 27 and Willand is allocated for mixed commercial floorspace including a travel hub, agronomy visitor centre, outdoor adventure zone and outlet shopping village. The policy includes transport provision, environmental protection, a comprehensive phasing programme and public master planning exercise.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	There are some important trees to the north of the site and in close proximity to a number of TPOs. The site falls within the 'Lowland plains' landscape character area and is typified as being an open, low lying flat landscape which is agriculturally prosperous. Development of this scale would have a significant impact on existing landscape character, altering the rural quality of the entrance into Mid Devon from the M5 and the rural character around Willand and Sampford Peverell. Landscape sensitivity is higher, primarily because of the lack of a relationship with an existing settlement, and the change to landscape character that would arise as a result. There are views available into the site from the west, as far as the canal in Sampford Peverell, whereas some parts feel isolated, with reduced visibility –	-3/?	The policy requires environmental protection and enhancement including noise mitigation. Furthermore Policy S9 'Environment' and DM1 'High Quality Design' in the Local Plan Review provide mitigation for both the impact on the landscape and the natural environment. The policy requires mitigation measures for the Culm	-1

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>though some parts are visible from the motorway. There are differences in character/visibility between the north and south, the north being more open and plainly visible, the south less so. The landscape appraisal for this site noted that employment development would potentially be more damaging from residential development owing to the larger scale buildings and infrastructure needed. A Phase I habitat survey for the northern commercial element of the site (Devon Biodiversity Records Centre, June 2014) was undertaken. The site includes a variety of habitat types including Biodiversity Action Plan habitats. The mature trees and hedgerows within the site were also identified as important for biodiversity.</p> <p>Natural England expressed the potential for the proposed leisure and retail development at J27 to impact on the Culm Grasslands SAC due to traffic impacting the air quality. Further information regarding traffic assessments and any consequential air quality assessment on the effects on this SAC will have to be undertaken to rule out any effect. Given the scale of development, impact on the landscape, biodiversity and potential impact on the Culm Grasslands SAC, overall a significant negative impact is considered although this remains uncertain.</p>		<p>Grasslands SAC where appropriate and the allocation will be subject to comprehensive masterplanning. Given the scale of development some landscape and biodiversity impact is likely to remain however mitigation provided helps to minimise the impact. The area considered is less than that appraised in the Proposed Submission SA and the proposal now considers mitigation if there is an impact on the Culm Grasslands SA, as such overall a slight negative effect is considered.</p>	
B) Protection and promotion of	<p>Since the Proposed Submission SA, a Historic Environment Appraisal (HEA) has been carried out including an assessment of the J27 policy in the modifications document and this SA has been updated to</p>	-2/?	<p>The policy requires high quality development as part of the allocation. The policy also</p>	0/?

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
a quality built and historic environment	reflect this latest assessment. The HEA identified that there are listed buildings close to the site and there may be some impact the immediate settings of these buildings. To some degree there will be an impact on the registered park and garden at Bridwell which is set on rising land to the east. To a limited degree the landscape settings of Sampford Peverell conservation area and the Grand Western Canal conservation area will also be affected. There is some uncertainty in the exact impact of the allocation given this will be dependent on site layouts, density, scale and design of buildings. This site occupies a substantial area within a landscape that has evidence of prehistoric and Roman activity, overall a negative and uncertain effect.		requires comprehensive masterplanning including at least two stages of public consultation and adoption of the masterplan as a Supplementary Planning Document before any planning application for any part of the site is determined. The HEA identifies opportunities to offset the visual impacts on the settings of various heritage assets. These opportunities are likely to be explored in detail as part of the masterplan which will provide mitigation. The potential archaeological impact at this stage could also be explored along with mitigation. As such a neutral effect is considered however this remains uncertain given the masterplan is not yet	



Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			adopted.	
C) Mitigating the effects of climate change	<p>The site contains a number of small streams but is located in flood zone 1 the lowest level of flood risk, a neutral effect. The site may also have some residual flood risk from the Grand Western Canal or Wimbleball Reservoir. The site could also contribute to surface water run off without appropriate mitigation measures. Given the scale of development carbon emissions could be high. Overall a significant negative effect and uncertain effect is considered given the potential but unknown impact of the small streams, the potential contribution to surface water run off and increased carbon emissions. Trips to the allocation are not all considered new journeys with the Mid Devon Tourism Study 2014 identifying a large volume of tourists who pass through Mid Devon on route to other destination. Furthermore, the proposal is for a niche market currently poorly provided for in the South West, arguably this proposal will reduce trip lengths of those currently seeking these services.</p>	-2/?	<p>A policy requirement in the Local Plan Review seeks mitigation measures through the provision of Sustainable Urban Drainage Schemes to deal with surface water run-off and arrangements for future maintenance. A flood risk assessment will be required as even though the site is in flood zone 1 it is over 1ha which will determine the impact of the small steams. The proposal promotes an electric car hub and provision of transport improvement to ensure appropriate accessibility for all mods including pedestrian and cycling links across the motorway to Tiverton Parkway Railway Station. The Mid Devon Tourism Study 2014</p>	-1/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			identifies a large volume of tourists who pass through Mid Devon on route to other destination. Trips to the allocation are not all considered new journeys with some of those who would previously pass through Mid Devon anticipated to stop at this destination. Overall a slight negative effect is considered although this remains uncertain.	
D) Safeguarding and minimising resource use	Part of Junction 27 borders the Mineral Consultation Area for Hillhead Quarry. Since the Proposed Submission Sustainability Appraisal, given the smaller site area and updated Devon County Council Minerals Plan (proposed for adoption) it is considered the development of the site will not constrain future working of the remaining permitted reserves within Hillhead Quarry. The site is located on mainly greenfield land with a small portion on brownfield land. The majority of the site is Grade 3 good / moderate quality land with a small section of the site to the west of the M5 grade 4 poor quality land. Given the scale of the development, on Grade 3 agricultural land a	-2		-2

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
	negative effect is considered.			
E) Promoting economic growth and employment	This option provides a site of 71 ha of commercial floorspace helping to diversify the economy and encourage inward investment, a significant positive effect. The policy states the allocation is for a major high quality regional tourism, leisure and retail attraction. Development in this location and at this scale has the potential to bring major inward investment and job creation for Mid Devon and the wider region.	+3		+3
F) Supporting retail	The option will deliver a 6ha designer outlet shopping centre, which will include up to 14,000 square metres of controlled comparison goods and up to 2,000 square metres of A3 uses. Since the Proposed Submission Sustainability Appraisal a number of town centre uses have been withdrawn from the earlier promoted schemes and a retail impact assessment has been used to determine the impact. This included an assessment of 14 towns and city centres including those outside of Mid Devon District and concluded that all centres would continue to achieve higher future trading turnovers than at the assessment year. The study also sets out how designer outlet villages differ from that in town centres and how they can be controlled by planning. Given the changes proposed to the policy and the findings of the retail impact assessment, the proposal significantly enhances the retail offer of the district a significant positive impact is considered.	+3	Limitations and controls provided in the policy have been provided since the previous assessment of this site. A retail impact assessment has also determined that all centres would continue to achieve higher future trading turnovers than at the assessment year. As such a significant positive impact is considered.	+3

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
G) Meeting housing needs	No additional housing is provided within the site. The Local Plan will provide for the additional housing required in response to the employment opportunity provided by this allocation. Please see Secondary/cumulative/synergistic effects below for additional information. In assessing this site and in considering that the housing needs will be met by the Local Plan a neutral effect is considered.	0		0
H) Ensuring community health and wellbeing	The proposal differs from that assessed in the Proposed Submission Sustainability Appraisal in which it meets a regional need and not an alternative for the housing and commercial needs of the towns as such the findings of this SA differs from that of the proposed submission version. The proposal will provide some benefit to existing and future communities in which it provides leisure and retail opportunities overall a slight positive effect is considered.	+1		+1
I) Delivering the necessary infrastructure	Further assessment work is needed to identify the transport impact, sustainable transport options and strategic infrastructure requirements an uncertain effect. Essential service infrastructure including; water supply, sewage works capacity, gas and electricity will need to be determined as deliverable. Overall a negative and uncertain effect is considered.	-2/?	The policy seeks the provision of supporting access roads, parking, infrastructure and landscaping of 43ha. It requires transport improvements to ensure appropriate accessibility for all modes, including new or improved access and egress onto the M5 motorway and pedestrian and	+2/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			<p>cycling links across the motorway to Tiverton Parkway Railway Station. The proposal also incorporates an electric car hub.</p> <p>Furthermore comprehensive masterplanning is required by policy will provide greater detail on delivering the necessary infrastructure. The policy also requires environmental protection and enhancement with the supporting text referencing the provision of green infrastructure. Overall a positive effect is considered, the uncertainty remains as the detail of providing the necessary infrastructure will be considered at the masterplanning and planning application stage.</p>	

Secondary/cumulative/synergistic effects:	A secondary effect of developing major high quality regional tourism, leisure and retail attraction at Junction 27 is the need for additional housing sites in response to the additional commercial development. This is provided for through the proposed allocation of Blundells School, Tiverton and Higher Town, Sampford Peverell. There will be a cumulative impact of traffic on the surrounding road network. The policy requires transport improvements to ensure appropriate accessibility for all modes. A Habitat Regulations Assessment of the Mid Devon Local Plan Review including Junction 27 has been undertaken which concludes that the J27 site allocation, alone or in combination with the Local Plan proposals, will not have an adverse effect on the integrity of the Culm Grasslands SAC.
Temporary/permanent effects :Timescale: Short (1-5 years), Medium (6-15 years), Long (15+ years)	Development will occur throughout the lifetime of the plan and the effect should be considered permanent.
Spatial extent: (District wide/local)	The policy set seeks to meet the employment needs of the District and wider region.

## Rural Areas

### Additional Appraisals for Bampton allocations

#### *Preferred Option Bampton – Former School, School Close*

Land with a gross site area of 0.7 (ha) at the Former School, School Road, Bampton is proposed for 26 residential dwellings with 38% affordable housing.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	The site falls within the 'River valley slopes and combes' landscape character area, which is defined as having steep, often wooded sides. An oak tree that sits within the boundary of the site should be retained. There are views over the town to the north and east, hedges and trees along Ball Hill mark the skyline to the south of the site. Wildlife corridors can be established through the site and the adjacent old school to enhance biodiversity. An ecological survey in 2009, note that dormice are known to be present in this part of Devon, rabbit tracks have been found but no badgers. Given the potential impacts on local wildlife, a slight negative effect is considered.	-1	Policy S9 'Environment' and DM1 'High Quality Design' in the Local Plan Review provides some mitigation. An overall neutral effect is considered.	0
B) Protection and promotion of a quality built and	The development site is not within or near the Bampton Conservation Area and development will not impact upon any Listed Buildings, a neutral effect.	0		0

historic environment				
C) Mitigating the effects of climate change	The site is located in flood zone 1 the lowest level of flood risk, a neutral effect. The site could contribute to surface water run off without appropriate mitigation measures. Bampton has access to a bus service which could help reduce car travel and therefore carbon emissions. Given the potential issues around surface water runoff but the benefit of a bus service on balance a neutral effect is considered.	0	A policy requirement in the Local Plan review seeks the provision of a sustainable urban drainage scheme to deal with all surface water from the development. Given the mitigation of surface water runoff and flood risk a slight positive effect is considered as there is the benefit of a bus service.	+1
D) Safeguarding and minimising resource use	This is a Greenfield site currently used as pastureland. Approximately a fifth of the site is Grade 3 good / moderate quality agricultural land and the remainder is Grade 4 poor quality agricultural land. Although the loss would be mainly poor quality agricultural land there would be some grade 3 agricultural land loss an overall slight negative effect is considered.	-1		-1
E) Promoting economic growth and employment	Site option does not result in the loss or gain of employment land, a neutral effect.	0		0
F) Supporting retail	The policy contains no retail proposals; a neutral effect is considered.	0		0



G) Meeting housing needs	Option provides for 26 new dwellings a contribution towards future housing need, a positive effect.	+2		+2
H) Ensuring community health and wellbeing	Bampton is a designated village under policy S13 of the Local Plan Review and is considered appropriate for limited development. Bampton has a reasonable range of services and frequent bus services. The school is adjacent the site enabling public to walk, new development supported by existing services Overall a neutral effect is considered.	0		0
I) Delivering the necessary infrastructure	The site would gain vehicular access via West Street which on its approach to the site is narrow and has no pedestrian facilities. It may be possible to provide a footway/cycleway access between the site and School Close passing though the adjacent old school site. The feasibility of the carriageway link to the adjacent site has been considered and is acceptable, a positive effect. Primary school has recently been expanded to support increased numbers in area and existing consents. Given site access is achievable and recent expansion of school a neutral effect is considered.	0		0

Secondary/cumulative/synergistic effects:	The cumulative impact of the development of this site has the potential to impact upon traffic congestion.
Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Within the short term, construction traffic associated with the development will contribute towards traffic congestion within Bampton. Once completed the development will be permanent.
Spatial extent: (District wide / local)	This site option will help meet the employment needs of Bampton.

**Additional Appraisals for Cheriton Fitzpaine allocations**

**Alternative Option OCF2: Cheriton Fitzpaine Landboat Farm – Amended SA commentary and scoring**

Land with a gross site area of 1.91 (ha) at Landboat Farm, Cheriton Fitzpaine is proposed for 55 dwellings.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	There are several mature trees, mainly horse chestnuts, within the site. The site is classed as being within the ‘Lower rolling farmed and settled valley slopes’ landscape character area. This area is defined as being predominantly open, rolling countryside (and further characterised by a tightly rolling, medium to small scale landform). Upon a further site assessment undertaken in response to a representation at the Proposed Submission stage it has been concluded that the existing development forms a backdrop of the site and therefore a neutral effect is considered in terms of landscape impact. A slight negative impact remains as there may be an impact on the mature trees within the site.	-1	Policy S9 ‘Environment’ and DM1 ‘High Quality Design’ in the Local Plan Review provide mitigation for the natural environment and a neutral effect is considered.	0
B) Protection and promotion of a quality built and historic environment	There are no listed buildings although there are some undesignated older (C19) farm buildings sited within the site and which may be worthy of retention as local heritage assets. As the buildings at this time are not designated as heritage assets they do not at this time hinder the score of the objective of this site, however if the buildings are to be assessed as heritage assets in future the SA will be amended to reflect this. In response to a representation made at the Proposed	+1		+1

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	Submission stage a further site assessment was undertaken and it is agreed that the development of the site would impact the connectivity between White Cross and the village resulting in a slight positive score overall.			
C) Mitigating the effects of climate change	A stream runs along the southern part of the site. The southwest of the site is within flood zone 2 and 3 (17%) with the remaining (83%) in flood zone 1. The site could contribute to surface water run off without appropriate mitigation measures. Overall a negative effect is considered. Cheriton Fitzpane has access to a bus service which could help reduce car travel and therefore carbon emissions. Given the potential issues around flooding but the benefit of a bus service, on balance a slight negative effect is considered. This remains uncertain as the impact of the stream is unknown.	-1/?	A policy requirement in the Local Plan Review seeks mitigation measures through the provision of Sustainable Urban Drainage Schemes to deal with surface water run-off and arrangements for future maintenance. If development avoided areas in flood zone 2 and 3 and a flood risk assessment is undertaken to determine the impact of the stream that runs through the centre of the southern part of the site a neutral effect is considered. Given the mitigation of flood risk a slight positive effect is considered as there is the benefit of a bus	+1/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			service. This remains uncertain as the impact of the stream is unknown.	
D) Safeguarding and minimising resource use	Development option is located on greenfield land. Site is located on Grade 3 good / moderate agricultural land with some of the site forming agricultural buildings. Given the relatively small size of the site a slight negative impact is considered.	-1		-1
E) Promoting economic growth and employment	In the south western part of the site, there is a group of buildings which are modern, open agricultural storage buildings and other storage facilities. Also contained within the site are a group of three traditional stone barns which link together to form a central yard. In response to a representation made at the Proposed Submission stage a further site assessment was undertaken and it is agreed that the buildings identified above are vacant with no evidence of recent use, therefore there would be no loss of employment land and the pre-mitigation score is proposed to be amended to 0.	0		0
F) Supporting retail	No impact.	0		0
G) Meeting housing needs	Option provides for 55 new dwellings a contribution towards future housing need, a positive effect.	+2		+2
H) Ensuring	Cheriton Fitzpaine is a designated village under policy S13, it has the	0	Retention of the land used for	+1

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
community health and wellbeing	<p>three essential services identified in policy S13 and is considered appropriate for a limited level of development, a neutral effect. Some of the land (the strip to the south of Cherry Meadow) already forms some form of informal recreational use with at least one resident having an opening from private gardens onto this land. Under previous planning policy this piece of land was designated as 'Important land for sport and recreation'. In response to a representation made at the Proposed Submission stage it is recognised that development of this site would link the village with White Cross and as such could improve both the built environment and community health and wellbeing. Given the provision of services and facilities, and potential for improvement of community cohesion but potential loss of some important although undesignated recreational land, a neutral effect is considered.</p>		<p>informal recreation and the benefit of improving community cohesion through the development of this site would result in a slight positive effect overall.</p>	
l) Delivering the necessary infrastructure	<p>Access into the site is via a farm track, formed within the past 10 years located approx. mid way along its northern boundary and with a large visibility splay with the Class III road, and has new Devon banks either side; this access has replaced the original farm access road along the western edge, which has been partially blocked at its egress onto the Class III road to only now allow for direct pedestrian access on this side. The local highway network of narrow roads has restrictive alignments and the existing access has inadequate visibility however an adequate access is considered achievable. In response to a</p>	0		0

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	representation made at the Proposed Submission stage a further site visit was undertaken which identified that an access could be accommodated without significant works. There is existing capacity in the local schools to accommodate development from this individual site. Overall a neutral effect is considered.			

Secondary/cumulative/synergistic effects:	The cumulative impacts of the development of this site has the potential to impact upon traffic, put pressure on services and facilities and the current provision of infrastructure. Development of this site in combination with other development in the local area could cumulatively lead to over capacity issues in the local schools.
Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Within the short term, construction traffic associated with the development will increase traffic within Cheriton Fitzpaine. Once completed the development will be permanent.
Spatial extent: (District wide / local)	This site option will help meet housing needs.

**Alternative Option New Site Cheriton Fitzpaine – Bramble Orchard**

Land with a gross site area of 2.44ha at Bramble Orchard, Cheriton Fitzpaine is proposed for 58 dwellings.

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
A) Protection of the natural	This site lies outside of the existing settlement boundary of Cheriton Fitzpaine. The site falls within the 'Lower rolling farmed	-2	Policy S9 'Environment' and DM1 'High Quality Design' in	-2

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
environment	and settled valley' landscape character areas which is typified as having a gently rolling and strongly undulating landscape which is intensively farmed. The landscape is undulating, with the higher parts more sensitive to change and development. The site is located at the top of a hill and would therefore be highly sensitive to development. There are no European wildlife sites or SSSIs located in close proximity to the site and there are no designations located within the site itself. However, the site borders Arthur's Wood which is probably a priority habitat. Given that the site is located outside of the existing settlement limit, and would have a significant negative impact on landscape character, a negative effect is considered.		the Local Plan Review would provide some mitigation. Overall a negative effect remains as the development is located outside of the existing settlement limit and would negatively impact landscape character.	
B) Protection and promotion of a quality built and historic environment	There are no listed buildings located in close proximity. Additionally, based on the information available to the Historic Environmental Record to date it is unlikely that any development will have an impact upon any heritage assets with archaeological interest. However the separation of the site from the main element of the village raises concerns about how well the final design could integrate the existing and proposed development, overall a slight negative effect is considered.	-1	Design could help provide some mitigation in integrating the development with the existing settlement, however due to the divorced nature of the site with the main settlement a slight negative effect would remain.	-1
C) Mitigating the effects of climate	There are no flood risk issues within the site boundary to be aware of. Cheriton Fitzpaine has access to a bus service which could help reduce car travel and therefore carbon emissions.	+1		+1

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
change	Overall a slight positive effect is considered.			
D) Safeguarding and minimising resource use	Development is located on a greenfield site which is grade 3 good / moderate agricultural land. Given the size and agricultural quality of the site, a slight negative effect is considered.	-1		-1
E) Promoting economic growth and employment	No impact.	0		0
F) Supporting retail	No Impact.	0		0
G) Meeting housing needs	Option provides for 58 new dwellings contributing towards future housing needs, a positive effect.	+2		+2
H) Ensuring community health and wellbeing	Cheriton Fitzpaine is a designated village under policy S13 and is considered suitable for limited development. The site is divorced from the settlement which may affect community cohesion, a slight negative effect.	-1	A slight negative effect would remain as the site is divorced from the settlement.	-1
I) Delivering the necessary infrastructure	Cheriton Fitzpaine primary school has the capacity to expand through the provision of an additional classroom. The school is located on the edge of the village, so would need to consider whether a safe walking route to the school can be provided. The site is very remote from Cheriton Fitzpaine and would be reliant	-2	Policy S8 could provide some mitigation by setting out that developers would be expected to contribute to, or bear the full cost of new or improved	-2/?



<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
	on private motor vehicles as there are no footways and no lighting. There are also concerns relating to the topography of the site and road widths which result in a poor forward visibility from the site. Overall a negative effect is considered.		infrastructure and facilities although the impact remains uncertain given that it is unclear how improved access could be provided and suitable pedestrian access. A negative although uncertain effect remains.	

Secondary/cumulative/synergistic effects:	The cumulative impacts of the development of this site has the potential to impact upon traffic, put pressure of services and facilities and impact landscape character.
Temporary/permanent effects :Timescale: Short (1-5 years), Medium (6-15 years), Long (15+ years)	Within the short term, construction traffic associated with the development will increase traffic within Cheriton Fitzpaine. Once completed the development will be permanent.
Spatial extent: (District wide/local)	This site option will help meet housing needs.

### **Additional Appraisals for Halberton allocations**

#### **Alternative Option New Site Halberton – The Pethers**

Land with a gross site area of 0.51ha at The Pethers, Halberton is proposed for 16 dwellings.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	The site lies adjacent to the designated village of Halberton. The site falls within the 'Lowland Plains' landscape character area which is typified as being an open, low lying flat landscape which is agriculturally prosperous. The Great Western Canal Conservation Area and local nature reserve lies to the west of the site but there are no European wildlife sites or SSSI designations in close proximity. The site would be relatively enclosed within the landscape due to its location between 'The Pethers' and 'Lagunas' and its position directly opposite the new housing development Cordwents View. Given the sites location in relation to existing settlement but its proximity to the Great Western Canal Conservation Area and local nature reserve, a slight negative effect is considered.	-1	Policy S9 'Environment' and DM1 'High Quality Design' in the Local Plan Review would provide some mitigation therefore a neutral effect is considered.	0
B) Protection and promotion of a quality built and historic environment	There are no heritage assets located in close proximity overall a neutral effect is considered.	0		0
C) Mitigating the effects of climate change	The site is located in flood zone 1 the lowest level of flood risk. Based on evidence set out in the SFRA there may be some residual flood risk from the Grand Western Canal. The site could contribute to surface water run off without appropriate	-1	Mitigation is provided by a policy requirement in the Local Plan Review which seeks the provision of a Sustainable	+1

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
	mitigation measures. Halberton has access to a bus service which could help reduce car travel and therefore carbon emissions. Given the potential issues around flooding but the benefit of a bus service, on balance a slight negative effect is considered.		Urban Drainage Scheme to deal with all surface water from development and arrangements for future maintenance. Appropriate mitigation measures should be incorporated into the design of development to respond to flood risk from the Grand Western Canal. Given the mitigation of flood risk a slight positive effect is considered as there is the benefit of a bus service in Halberton.	
D) Safeguarding and minimising resource use	Development option is located on greenfield land. The site is located on grade 1 excellent quality agricultural land. Given the loss of Grade 1 excellent quality agricultural land but the relatively small scale of the site, a negative effect is considered.	-2		-2
E) Promoting economic growth and employment	No impact.	0		0
F) Supporting	No Impact.	0		0

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
retail				
G) Meeting housing needs	Option provides for 16 new dwellings contributing towards future housing needs, a slight positive effect is considered.	+1		+1
H) Ensuring community health and wellbeing	Halberton is a designated village under policy S13, it has the three essential services identified in policy S13 and is considered appropriate for a limited level of development, a neutral effect.	0		0
I) Delivering the necessary infrastructure	Halberton Primary School currently has some spare capacity. This site would generate an additional 5 primary school pupils, which can be accommodated at the primary school. Given the small scale of development it is anticipated that this development will not as an individual site put pressure on the local secondary schools. The site would need an estate road to serve the development which may restrict the yield of housing. Given the current capacity within the local schools and that access to the site is achievable a neutral effect is considered.	0		0

Secondary/cumulative/synergistic effects:	The cumulative impact of the development of this site has the potential to impact upon traffic, put pressure on services and facilities and the current provision of infrastructure. Development of this site in combination with other development in the local area could cumulatively lead to over-capacity issues in the local schools.
Temporary/permanent effects :Timescale: Short	Within the short term, construction traffic associated with the development will increase

(1-5 years), Medium (6-15 years), Long (15+ years)	traffic along Crown Hill Road, Halberton. Once completed the development will be permanent.
Spatial extent: (District wide/local)	This site option will help meet housing needs.

**Additional Appraisals for Newton St Cyres allocations**

**Alternative Option New Site Newton St Cyres – New Estate Site A**

Land with a gross site area of 1.4ha at New Estate, Newton St Cyres is proposed for 44 dwellings.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	The site falls within the ‘Lowland Plains’ which is typified as being an open, low lying flat landscape and the ‘sparsely settled farmed valley floors’ landscape character area which is typified by the presence of rivers and streams and related flat or gently sloping valley bottoms within the low lying areas of the district. The site is relatively open and flat with the surrounding landscape consisting of agricultural land, trees and occasional isolated dwellings. There are no European wildlife sites or SSSI designations located in close proximity. Overall the site has a slight negative score as the site is highly visible but there is existing development forming a backdrop.	-1	Policy S9 ‘Environment’ and DM1 ‘High Quality Design’ in the Local Plan Review would provide some mitigation therefore a neutral effect is considered.	0
B) Protection and promotion of	There are no listed buildings located in close proximity. This proposed development site lies within a landscape where there is a concentration of prehistoric and Romano-British sites recorded	-1/?	Local Plan Review policy DM25 would provide some mitigation by requiring that any planning	0/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
a quality built and historic environment	on the County Historic Environment Record. Given the possibility of potential for archaeological assets, a slight negative and uncertain effect is considered.		application include sufficient information to enable a description of a heritage asset affected and a consideration of the impact of development upon it. Based on information from Devon County Council this may take the form a programme of intrusive archaeological investigations of areas that will be affected by development here. Overall a neutral effect although this remains uncertain as the impact will depend on the results of the investigation.	
C) Mitigating the effects of climate change	The site is located outside in flood zone 1. However, an ordinary watercourse is within the site boundary. The site could contribute to surface water run off without appropriate mitigation measures. Newton St Cyres has access to a bus and train service which could help reduce car travel and therefore carbon emissions. Given the potential issue around flooding with the presence of an ordinary watercourse and risk of surface water	0/?	Some mitigation would be provided through policy S9 'Environment' in the Local Plan Review which seeks the provision of sustainable drainage systems to deal with all surface water from the	+2/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	flooding but the benefit of a bus and train service overall a neutral and uncertain effect is considered as the impact of the watercourse is unknown.		development. Based on the recommendations provided by Devon County Council, this may require that any development should be accompanied by a suitable drainage strategy to deal with existing surface water flows and any potential increase in surface runoff. Given the mitigation of flood risk using SuDS, and the availability of bus and train service, a positive effect is considered although uncertain given the presence of the ordinary watercourse within the site boundary.	
D) Safeguarding and minimising resource use	Development is located on a greenfield site which is partly (1.11ha) grade 3 good / moderate agricultural land and partly (0.29 ha) grade 1 agricultural land, a negative effect, given the size of the site.	-2		-2
E) Promoting	No impact.	0		0

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
economic growth and employment				
F) Supporting retail	No Impact.	0		0
G) Meeting housing needs	Option provides for 44 new dwellings contributing towards future housing needs, a positive effect.	+2		+2
H) Ensuring community health and wellbeing	Newton St Cyres is a designated village under policy S13, it has the three essential services identified in policy S13 and is considered appropriate for a limited level of development, a neutral effect.	0		0
I) Delivering the necessary infrastructure	There is existing capacity in the local schools to accommodate development from this individual site. Access to the site option is quite constrained; the junction at Station Road adjacent to the entrance is substandard in terms of visibility and is unlikely to be suitable for increased traffic. The road is narrow with substandard alignments and there are no footways. Highways have raised their concerns over pedestrian safety and have recommended the rejection of this allocation. Given the concerns of the highways agency a significant negative effect is considered.	-3	Policy S8 would provide some mitigation by setting out that developers would be expected to contribute to, or bear the full cost of new or improved infrastructure and facilities. Overall a negative and uncertain effect is considered given the concerns of the highway authority with the solution uncertain without	-2/?



Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			further evidence.	

Secondary/cumulative/synergistic effects:	The cumulative impacts of the development of this site has the potential to impact upon traffic, put pressure on services and facilities and the current provision of infrastructure. Development of this site in combination with other development in the local area could cumulatively lead to overcapacity issues in the local schools.			
Temporary/permanent effects :Timescale: Short (1-5 years), Medium (6-15 years), Long (15+ years)	Within the short term, construction traffic associated with the development will increase traffic within Newton St Cyres. Once completed the development will be permanent.			
Spatial extent: (District wide/local)	This site option will help meet housing needs.			

***Alternative Option New Site Newton St Cyres – New Estate Site B***

Land with a gross site area of 1.3ha at New Estate, Newton St Cyres is proposed for 41 dwellings.

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
A) Protection of the natural environment	The site falls within the ‘Lowland Plains’ and ‘Sparsely settled farmed valley floors’ landscape character areas. The site itself is relatively open and is surrounded by agricultural land, trees and the occasional isolated dwellings. There are no European wildlife sites or SSSI designations in close proximity and no specific designations within the site that would impact on biodiversity. Given that development here would impact landscape character	-2	Policy S9 ‘Environment’ and DM1 ‘High Quality Design’ in the Local Plan Review would provide some mitigation therefore a slight negative effect is considered.	-1

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
	with limited development backdrop, a negative effect is considered.			
B) Protection and promotion of a quality built and historic environment	There are no listed buildings located in close proximity. The site lies within a landscape where there is a concentration of prehistoric and Romano-British sites recorded on the County Historic Environment Record. Given the potential for archaeological assets to be discovered here, a slight negative and uncertain effect is considered.	-1/?	Local Plan Review policy DM25 would provide some mitigation by requiring that any planning application include sufficient information to enable a description of a heritage asset affected and a consideration of the impact of development upon it. Based on information from Devon County Council this archaeological information should consist of the results of a programme of intrusive archaeological investigation of areas that will be affected by development here. Overall a neutral effect although this remains uncertain as the impact will depend on the results of the investigation.	0/?
C) Mitigating	The site is located outside in flood zone 1. However, an ordinary	0/?	Some mitigation would be	+2/?

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
the effects of climate change	watercourse is within the site boundary. The site could contribute to surface water run off without appropriate mitigation measures. Newton St Cyres has access to a bus and train service which could help reduce car travel and therefore carbon emissions. Given the potential issue around flooding with the presence of an ordinary watercourse and risk of surface water flooding but the benefit of a bus and train service overall a neutral and uncertain effect is considered as the impact of the watercourse is unknown.		provided through policy S9 'Environment' in the Local Plan Review which seeks the provision of sustainable drainage systems to deal with all surface water from the development. Based on the recommendations provided by Devon County Council, this may require that any development should be accompanied by a suitable drainage strategy to deal with existing surface water flows and any potential increase in surface runoff. Given the mitigation of flood risk using SuDS, and the availability of bus and train service, a positive effect is considered although uncertain given the presence of the ordinary watercourse within the site	

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			boundary.	
D) Safeguarding and minimising resource use	This site option is located on a greenfield site which is comprised of two grades of agricultural land. 0.3ha of which is grade 1 excellent quality agricultural land and the remaining 1ha is grade 3 good / moderate agricultural land. A negative effect is considered.	-2		-2
E) Promoting economic growth and employment	No impact.	0		0
F) Supporting retail	No Impact.	0		0
G) Meeting housing needs	Option provides for 41 new dwellings contributing towards future housing needs, a positive effect.	+2		+2
H) Ensuring community health and wellbeing	Newton St Cyres is a designated village under policy S13, it has the three essential services identified in policy S13 and is considered appropriate for a limited level of development, a neutral effect.	0		0
I) Delivering the necessary infrastructure	There is existing capacity in the local schools to accommodate development from this individual site. Access to the site option is quite constrained; the junction at Station Road adjacent to the entrance is substandard in terms of visibility and is unlikely to be	-3	Policy S8 would provide some mitigation by setting out that developers would be expected to contribute to, or bear the	-2/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	suitable for increased traffic. The road is narrow with substandard alignments and there are no footways. Highways have raised their concerns over pedestrian safety and have recommended the rejection of this allocation. Given the concerns of the highways agency a significant negative effect is considered.		full cost of new or improved infrastructure and facilities. Overall a negative and uncertain effect is considered given the concerns of the highway authority with the solution uncertain without further evidence.	

Secondary/cumulative/synergistic effects:	The cumulative impacts of the development of this site has the potential to impact upon traffic, put pressure on services and facilities and the current provision of infrastructure. Development of this site in combination with other development in the local area could cumulatively lead to overcapacity issues in the local schools.
Temporary/permanent effects :Timescale: Short (1-5 years), Medium (6-15 years), Long (15+ years)	Within the short term, construction traffic associated with the development will increase the traffic within Newton St Cyres. Once complete the development will be permanent.
Spatial extent: (District wide/local)	This site option will help meet housing needs.

**Additional Appraisals for Sampford Peverell allocations**

**Preferred Option SP2 – Higher Town, Sampford Peverell: 6ha, 60 dwellings**

Land with a gross site area of 6 (ha) at Higher Town, Sampford Peverell is proposed for 60 dwellings with 30% affordable housing.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	The site falls within the ‘Lowland plains’ landscape character area and is typified as being an open, low lying flat landscape which is agriculturally prosperous. The overall rise above Turnpike is significant and there are far-reaching views to and from the site. If suitable access could be achieved, given the steep gradients, it is likely that a substantial length of hedgerow would need to be removed. Visually the character of the area is agricultural and divorced from the village, with only a few low density detached dwellings on the opposite side of Turnpike. Given the impact on the landscape but limited mitigation provided by existing development and potential loss of a substantial length of hedgerow a negative effect is considered.	-2	Policy S9 ‘Environment’ and DM1 ‘High Quality Design’ in the Local Plan Review provide mitigation for both the impact on the landscape and the natural environment. Furthermore the policy requires landscaping and design which respects the setting and character of the area. The policy also requires mitigation of any wildlife impact including the protection of hedgerows and provides 2 hectares of Green Infrastructure. Overall a neutral effect is considered.	0
B) Protection and	The site is adjacent to Sampford Peverell Conservation Area to	-2/?	The policy includes green	0/?

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
promotion of a quality built and historic environment	North East. The site occupies an area enclosed in the medieval period and archaeological remains associated with the earlier field system and archaeological remnants may be affected by development here. Given the potential impact on the Conservation Area and archaeology a negative and uncertain effect is considered.		infrastructure, landscaping and design which respect the setting and character of the area, conservation area and listed building. It also requires archaeological investigation and appropriate mitigation. Overall a neutral effect is considered although this remains uncertain as the impact on archaeology will depend on the results of the investigation.	
C) Mitigating the effects of climate change	The site is located in flood zone 1 the lowest level of flood risk, a neutral effect. The site could contribute to surface water run off without appropriate mitigation measures. Evidence in the SFRA suggests that the site may also have some residual flood risk from the Grand Western Canal or Wimbleball Reservoir. Sampford Peverell has access to a bus and train service which could help reduce car travel and therefore carbon emissions. Given the potential issues around surface water run off and flood risk but the benefit of a bus and train service on balance a neutral effect is considered.	0	A policy requirement in the Local Plan Review seeks mitigation measures through the provision of Sustainable Urban Drainage Schemes to deal with surface water run-off and arrangements for future maintenance. The surface water run off and flood risk can be mitigated and there is a	+2

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
			benefit of a bus and train service, overall a positive effect is considered.	
D) Safeguarding and minimising resource use	Development option is located on greenfield land. The site is located on Grade 2 very good quality agricultural land. Given the loss of very good quality agricultural land but the relatively small site area an overall negative effect is considered.	-2		-2
E) Promoting economic growth and employment	No impact.	0		0
F) Supporting retail	No impact.	0		0
G) Meeting housing needs	Option provides for 60 new dwellings with 30% affordable housing a contribution towards future housing need, a positive effect.	+2		+2
H) Ensuring community health and wellbeing	Sampford Peverell is a designated village under policy S13, it has the three essential services identified in policy S13 and is considered appropriate for a limited level of development, a neutral effect.	0		0
I) Delivering the necessary infrastructure	Since the Proposed Submission Sustainability Appraisal, there has been confirmation that access is achievable and therefore the uncertainty has been removed. The Highway Authority has advised that any development of the site should only commence	-1	Improvement of the site access would improve visibility. Policy requires no development until the	0



Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>once improvements to the A361 junction at Sampford Peverell have been implemented. There is a footpath on Turnpike from the south east corner of the site which leads into the village. There are no footpaths on Higher Town or on Turnpike to the west. Within the village, pedestrian and cycle links are good, with access to the Grand Western Canal and the cycle path connecting the train station to Tiverton and Willand. Access onto Turnpike would require substantial hedgerow and earth removal. There is existing capacity in the local schools to accommodate development from this individual site. Given that access is achievable but would require additional works a slight negative effect is considered.</p>		<p>completion of improved access works to the A361. Overall a neutral effect is considered.</p>	

Secondary/cumulative/synergistic effects:	The cumulative impacts of the development of this site may have an impact on traffic. The policy requires no development until the completion of improved access works to the A361 to ensure the cumulative effect on the A361 is mitigated for.
Temporary/permanent effects :Timescale: Short (1-5 years), Medium (6-15 years), Long (15+ years)	Within the short term, construction traffic associated with the development will increase the traffic within Sampford Peverell. Once complete the development will be permanent.
Spatial extent: (District wide/local)	This site option will help meet housing needs associated with the Junction 27 option.

**Additional Appraisals for Thorverton allocations**

**Alternative Option TH1: South of Broadlands – extended site 1.15ha, 20 dwellings**

Land with a gross site area of 1.15 (ha) at South of Broadlands, Thorverton is proposed for 20 dwellings with 30% affordable housing.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	The site falls within the ‘Lowland plains’ landscape character area and is typified as being an open, low lying flat landscape which is agriculturally prosperous. The site is partially screened by the topography of the land adjacent to the east, known as Peter’s Hill. There are distant views of the site from the west, but this could be limited through the use of screening. The site itself is fairly level and there would be limited visual impact on the character of Thorverton. As there are distant views of the site from the west a slight negative effect is considered.	-1	Policy S9 ‘Environment’ and DM1 ‘High Quality Design’ in the Local Plan Review would provide mitigation and therefore, and overall neutral effect is considered.	0
B) Protection and promotion of a quality built and historic environment	The site lies just to the north of a large, probably prehistoric enclosure site, a slight negative and uncertain effect.	-1/?	The policy will require archaeological investigation and appropriate mitigation, a neutral effect is considered overall although this remains uncertain as the impact will depend on the results of the investigation.	0/?

C) Mitigating the effects of climate change	Part of the site (south eastern) is within Zone 3 Source Protection Zone. The site is located in flood zone 1, the lowest level of flood risk, a neutral effect. The site could contribute to surface water run off without appropriate mitigation measures. Thoverton has access to a bus service which could help reduce car travel and therefore carbon emissions. Given the potential issues around flooding but the benefit of a bus service on balance a slight negative effect is considered.	-1	A policy requirement in the Local Plan seeks the provision of a sustainable urban drainage scheme to deal with all surface water from the development. As the site is within a Source Protection Zone, appropriate forms of sustainable urban drainage should be used, overall a neutral effect.	0
D) Safeguarding and minimising resource use	Development option is located on greenfield land. The site is located on Grade 1 agricultural land. As the site is small scale but is on excellent quality agricultural land a negative impact is considered.	-2		-2
E) Promoting economic growth and employment	Site option does not result in the loss or gain of employment land, a neutral effect.	0		0
F) Supporting retail	Site option does not contain any retail proposals, a neutral effect.	0		0
G) Meeting housing needs	Option provides for 20 new dwellings with 30% affordable a contribution towards future housing need, a positive effect.	+2		+2
H) Ensuring community	Thorverton is a designated village under policy S13, it has the three essential services identified in policy S13 and is considered	-2	If the allotments were provided elsewhere of similar	+1/?

health and wellbeing	appropriate for a limited level of development, a neutral effect. Development of the site would result in the loss of allotments overall a negative effect is considered.		accessibility the loss of allotments would be mitigated and therefore this impact would be neutral. The policy requires a road widening and provision of a footpath along site frontage which in this case will be beneficial for the wider community as well as the development. Overall a slight positive effect is considered although this is uncertain given an alternative location for the allotments has not been indicated.	
I) Delivering the necessary infrastructure	Access is achievable but would require road widening and footway link. The size of this alternative would require the road to be built to an adoptable standard with a carriageway width of 4.8m and 2x2m footways either side in order to provide adequate visibility to and from oncoming traffic. The access road would need to go through the garages currently near the site. The Mid Devon Community Infrastructure Evidence Report indicates that the local secondary school has capacity however; Thorverton primary school is at overcapacity. The school is popular and has historically admitted pupils from outside its catchment area. Despite the forecast	-3	Policy S8 provides mitigation by setting out that developers will be expected to contribute to, or bear the full cost of, new improved infrastructure and facilities. Overall a neutral effect is considered. If the policy requires road widening built to an adoptable standard with a carriageway width of	0/?

	<p>showing the school to be overcapacity, it is likely that children within the small development will be able to secure a place at the school but developer contributions will be required. Given the need for significant road improvements and footway link and the requirement for developer contributions to provide capacity at the school a significant negative effect is considered.</p>		<p>4.8m and 2x2m footways either side in order to provide adequate visibility this would mitigate any impact and a neutral score is considered. However this would require the garages to be in control of the applicant in order to meet this standard, given the garages are not in control of the applicant an uncertain effect remains.</p>	
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<p>Secondary/cumulative/synergistic effects:</p>	<p>Development of this site in combination with other development in the local area could cumulatively lead to overcapacity issues in the other schools.</p>
<p>Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)</p>	<p>Within the short term, construction traffic associated with the development will increase traffic within Thorverton. Once completed the development will be permanent.</p>
<p>Spatial extent: (District wide / local)</p>	<p>This site option will help meet housing needs.</p>

**Alternative Option New Site Thorverton – Land North East of Silver St**

Land with a gross site area of 0.35 ha at the North East of Silver Street, Thorverton is proposed for 13 dwellings.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	The site falls within the ‘Lowland Plains’ landscape character area which is typified as being an open, low lying flat landscape. Most parts of the site are well enclosed within the landscape with no far reaching views other than towards the south whereby views consist of agricultural fields and trees. The site is enclosed by a hill towards the south and existing housing development towards the east and west. Given that development of this site would have a good relationship with existing development a neutral effect is considered.	0		0
B) Protection and promotion of a quality built and historic environment	There are no listed buildings located in close proximity. In addition, based on the information available to the Historic Environment Record to date, any development here will have no impact upon any heritage assets with archaeological interest. Therefore, a neutral effect is considered.	0		0
C) Mitigating the effects of climate change	The site is located in flood zone 1 the lowest level of flood risk. There are a no flood risk issues within the site boundary to be aware of. Thorverton has access to a bus service which could help reduce car travel and therefore carbon emissions. Overall a slight positive effect is considered.	+1		+1

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
D) Safeguarding and minimising resource use	The site is located on a greenfield site which is grade 2 good quality agricultural land. A negative effect.	-2		-2
E) Promoting economic growth and employment	No impact.	0		0
F) Supporting retail	No impact.	0		0
G) Meeting housing needs	Option provides for 13 new dwellings contributing towards future housing needs, a slight positive effect.	+1		+1
H) Ensuring community health and wellbeing	Thorverton is a designated village under policy S13, it has the three essential services identified in policy S13 and is considered appropriate for a limited level of development, a neutral effect.	0		0
I) Delivering the necessary infrastructure	The Mid Devon Community Infrastructure Evidence Report indicates that the local secondary school has capacity however Thorverton primary school is at overcapacity. The school is popular and has historically admitted pupils from outside its catchment area. Despite the forecast showing the school to be overcapacity, given the scale of the development it is likely that	-1	Policy S8 would provide some mitigation by setting out that developers would be expected to contribute to, or bear the full cost of new or improved infrastructure and facilities.	0

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	children within this individual small development could secure a place at the school but developer contributions will be required. There are no significant constraints in terms of access, subject to an appropriate estate road. Given suitable access route, but limited capacity in the local Primary School, a slight negative effect is considered.		Overall a neutral effect is considered.	

Secondary/cumulative/synergistic effects:	The cumulative impacts of the development of this site has the potential to impact upon traffic, put pressure on services and facilities and the current provision of infrastructure. Development of this site could lead to overcapacity issues in the local schools.
Temporary/permanent effects :Timescale: Short (1-5 years), Medium (6-15 years), Long (15+ years)	Within the short term, construction traffic associated with the development will increase traffic within Thorverton. Once completed the development will be permanent.
Spatial extent: (District wide/local)	This site option will help meet housing needs.

**Alternative Option New Site Thorverton – Land to the West of Lynch Close and Cleaves Close**

Land with a gross site area of 1.32 ha at the West of Lynch Close and Cleaves Close, Thorverton is proposed for 41 dwellings.

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
A) Protection of the natural environment	The site falls within the ‘Lowland Plains’ landscape character area. The site is relatively enclosed by housing on the eastern side and hedgerows and trees surrounding the remainder. Given the	0		0



Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	minimal impact on landscape character and the sites relationship to existing settlement, a neutral effect is considered.			
B) Protection and promotion of a quality built and historic environment	There is a grade II listed building (Higher Dunsaller) located adjacent to the southern boundary of the site. Furthermore, the site occupies a position in the landscape where prehistoric activity is recorded in the County Historic Environment Record. Given the sites close proximity to a listed building and the potential for archaeological assets, a negative and uncertain effect is considered.	-2/?	Local Plan Review policy DM25 would provide some mitigation by requiring that development proposals consider the significance, character, setting and local distinctiveness of heritage assets and any opportunities to enhance them. In addition, policy requires that any planning application include sufficient information to enable a description of a heritage asset affected and a consideration of the impact of development upon it. Based on information from Devon County Council this may take the form of 1) an archaeological geophysical	0/?

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
			survey and 2) a programme of intrusive archaeological investigation of areas that will be affected by development here. Overall a neutral effect although this remains uncertain as the impact will depend on the results of the investigation.	
C) Mitigating the effects of climate change	The site is located in flood zone 1. There are a no flood risk issues within the site boundary to be aware of. Thorverton has access to a bus service which could help reduce car travel and therefore carbon emissions. Overall a slight positive effect is considered.	+1		+1
D) Safeguarding and minimising resource use	The site is located on a greenfield site which is grade 1 excellent quality agricultural land. A negative effect, given the size and scale of the site.	-2		-2
E) Promoting economic growth and employment	No impact.	0		0
F) Supporting retail	No impact.	0		0

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
G) Meeting housing needs	Option provides for 41 new dwellings contributing towards future housing needs, a positive effect is considered.	+2		+2
H) Ensuring community health and wellbeing	Thorverton is a designated village under policy S13, it has the three essential services identified in policy S13 and is considered appropriate for a limited level of development, a neutral effect.	0		0
I) Delivering the necessary infrastructure	The Mid Devon Community Infrastructure Evidence Report indicates that the local secondary school has capacity however Thorverton primary school is at overcapacity. The school is popular and has historically admitted pupils from outside its catchment area. There may also be opportunities for expansion if required. There are no significant constraints in terms of access; there are possible access junctions from both north and south. The southern road presents greater opportunity to provide footway and road widening. Given suitable access route, but limited capacity in the local Primary School, a slight negative effect is considered.	-1	Policy S8 would provide some mitigation by setting out that developers would be expected to contribute to, or bear the full cost of new or improved infrastructure and facilities although the impact remains uncertain given the limited capacity to expand the school. Overall a neutral effect is considered given that there is limited capacity to expand the school.	0

Secondary/cumulative/synergistic effects:	The cumulative impacts of the development of this site has the potential to impact upon
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	traffic, put pressure on services and facilities and the current provision of infrastructure. Development of this site could lead to overcapacity issues in the local schools.
Temporary/permanent effects :Timescale: Short (1-5 years), Medium (6-15 years), Long (15+ years)	Within the short term, construction traffic associated with the development will increase within Thorverton. Once completed the development will be permanent.
Spatial extent: (District wide/local)	This site option will help meet housing needs.

### **Additional Appraisals for Uffculme allocations**

#### **Alternative Site Option - Land west of Uffculme, Uffculme**

Land with a gross site area of 3.49 (ha) at Uffculme is proposed for 60 dwellings. Following an appeal decision in February 2016 allowing outline planning permission for a site of 3.49ha with 60 dwellings, the site has been reappraised taking into account the revised proposal and inspectors comments.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	The site is within the 'Lowland plains' landscape character area. This area is characterised by having an open, low lying flat agricultural landscape. The fields to the north of the B3340 are partially screened from views by the existing field boundaries. The southern field is more open, and offers wider and more distant views to the south, therefore potential landscape impacts. A large number of protected trees adjoin the site on the eastern boundary. As there are distant views to the south and a number of protected trees adjoining the site overall a negative impact is considered.	-2	The appeal decision applies a condition for the submission of an arboricultural method statement and tree protection plan which will ensure the retention of existing trees in the interest of public amenity and the character and appearance of the area. Policy	0

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
			S9 'Environment' and DM1 'High Quality Design' in the Local Plan Review provide mitigation for both the impact on the landscape and the natural environment a neutral effect is considered.	
B) Protection and promotion of a quality built and historic environment	This site occupies a substantial area where prehistoric activity is recorded in the wider landscape. The site is located opposite from the boundary of Bridwell Park, a nationally important grade I listed historic park and garden. However there is little intervisibility between the site and the nearest boundary point, there is an intervening parcel of land and there is screening by hedgebanks and trees along the boundaries of this intervening land, the Historic Environment Appraisal considers there to be no significant impact. An appeal was dismissed in 2007 in Uffculme on the basis that the woodland to the east of this site provides an important and attractive feature defining the end of the village and functioning as an appropriate settlement boundary. However in the more recent appeal decision in 2016. The inspector makes reference to the 2007 appeal decision and although does not disagree with the above observation states that the reference was made in a different context and for the proposal in question considered by this appraisal there	-1/?	The appeal decision applies a condition to secure a scheme of archaeological work with the aim of recording of any features of heritage interest. Overall with mitigation the site scores a neutral effect although the score remains uncertain given the impact on the prehistoric activity is unknown.	0/?

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
	<p>would be no material harm to the character or appearance of the area. A slight negative effect overall is considered given the potential impact on the area of prehistoric activity. Uncertainty is also considered as the impact on the prehistoric activity is unknown.</p>			
<p>C) Mitigating the effects of climate change</p>	<p>The site area includes some flood zone 2 and 3 with the majority of the site located in flood zone 1 the lowest level of flood risk. The site could contribute to surface water run off without appropriate mitigation measures, a negative effect overall. Uffculme has access to a bus service which could help reduce car travel and therefore carbon emissions. Given the potential issues around flooding but the benefit of a bus service on balance a slight negative effect is considered.</p>	<p>-1</p>	<p>The 2016 appeal decision notes that development can be confined to Flood Zone 1 and the Environment Agency does not object to the development. A condition is applied to require the details of materials, boundary treatments, finished floor levels, existing and proposed site levels and proposed road and footpath levels to be included within the reserved matters which will help address flood risk. A condition is also secured to ensure that a surface water drainage scheme is required for the Council's approval and this should be based on SUDs</p>	<p>+1</p>

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
			principles and that dwellings are not occupied until sufficient capacity exists within the public sewerage network. With mitigation and the benefit of a bus service a slight positive effect is considered.	
D) Safeguarding and minimising resource use	Development option is located on greenfield land. The site is located on Grade 3 and 4 agricultural land and is relatively small therefore an overall a slight negative impact.	-1		-1
E) Promoting economic growth and employment	No impact.	0		0
F) Supporting retail	No impact.	0		0
G) Meeting housing needs	Option provides for 60 new dwellings with 35% affordable housing. A contribution towards future housing need, a positive effect.	+2		+2
H) Ensuring community	Uffculme is a designated village under policy S13, it has the three essential services identified in policy S13 and is considered	0		0

Sustainability objective	Commentary	Impact	Mitigation	Post Mitigation
health and wellbeing	appropriate for a limited level of development, a neutral effect. The previous SA noted that the location of this site would result in long walking distances to village facilities, with particular reference to the site being 1 mile from the primary school which could restrict young children walking to school however in the 2016 appeal decision the inspector states that in his view the appeal site is within an acceptable and safe walking distance of the village services and facilities. As such overall a neutral effect is considered.			
I) Delivering the necessary infrastructure	Site access is achievable subject to any development requiring the extension of the 30 mph limit. The footway at Culm Valley Way would need to be extended to the site. The Mid Devon Community Infrastructure Evidence Report indicates that the primary school can accommodate additional pupils arising from this development without expansion. Given an adequate site access is achievable but the need for footways an overall slight negative effect is considered.	-1	In the interests of highway and pedestrian safety, the appeal decision in 2016 applies a condition to ensure that vehicular access and footway linking the site to the village is provided prior to occupation of the dwellings. Overall a neutral effect is considered.	0

Secondary/cumulative/synergistic effects:	The cumulative impacts of the development of this site has the potential to impact upon traffic, put pressure on services and facilities and the current provision of infrastructure. Development of this site in combination with other development in the local area could cumulatively lead to over-capacity issues in the local schools.
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Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Within the short term, construction traffic associated with the development will increase traffic within Uffculme. Once completed the development will be permanent.
Spatial extent: (District wide / local)	This site option will help provide housing in Uffculme.

### **Additional Appraisals for Willand allocations**

#### **Alternative Option W11: Land east of M5, extended area 14.8ha, 174 dwellings**

Land with a gross site area of 14.8 (ha) at land east of M5, Willand is proposed for 174 dwellings with 30% affordable housing.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	The site lies within the 'Lowland plains' landscape character area and is typified as being an open, low lying flat landscape which is agriculturally prosperous. The site is generally flat in nature, and is well screened from views from the west into the site. The existing adjacent housing to the east is well screened by the high trees, and therefore any new developments would only represent an impact when viewed from the west. There is evidence of otters within one of the fields. The site adjoins two areas of deciduous woodland priority habitats, one in the north east and one in the south west. The site is surrounded by hedgerows which can be a haven for wildlife. Given the scale of development which may have an impact on the landscape but the proximity of the site to existing development and the M5 an overall negative impact is considered.	-2	Policy S9 'Environment' and DM1 'High Quality Design' in the Local Plan Review would provide some mitigation however given the scale of the site a slight negative effect is considered to remain.	-1

B) Protection and promotion of a quality built and historic environment	No anticipated impact on any known heritage assets, a neutral effect is considered.	0		0
C) Mitigating the effects of climate change	The site is located in flood zone 1 the lowest level of flood risk, a neutral effect. The site could contribute to surface water run off without appropriate mitigation measures, a slight negative effect. There is a 25-50% chance of groundwater emergence within the site boundary. Evidence in the SFRA suggests that the site may also have some residual flood risk from the Grand Western Canal or Wimbleball Reservoir. Willand has access to a bus service which could help reduce car travel and therefore carbon emissions. Given the potential issue around surface water runoff and flood risk and the potential for large scale impacts on groundwater, a negative effect is considered.	-2	A policy requirement in the Local Plan Review seeks the provision of a sustainable urban drainage scheme to deal with all surface water from the development. Appropriate mitigation measures should be incorporated into the design of development to respond to the flood risk from the Grand Western Canal or Wimbleball Reservoir. Given the mitigation of surface water runoff and flood risk a slight positive effect is considered as there is the benefit of a bus service.	+1
D) Safeguarding and minimising	Development option is located on greenfield land. Approximately 7 ha of the site lies within grade 1 excellent quality agricultural land and 6.4 ha lies within grade 3 good / moderate agricultural land.	-2		-2

resource use	Overall a negative effect is considered as development of the site would result in the loss of grade 1 agricultural land.			
E) Promoting economic growth and employment	Option provides approximately 174 new dwellings. Development of this scale would be a boost to local construction firms and associated trades who would benefit from being able to undertake contract work on the site. There would therefore be some positive impact.	+1		+1
F) Supporting retail	This option proposes a large scale residential development within a village. The policy contains no retail proposals, a neutral effect.	0		0
G) Meeting housing needs	Option provides for 174 new dwellings with 30% affordable housing a contribution towards future housing need, a significant positive effect.	+3		+3
H) Ensuring community health and wellbeing	Willand is a designated village under policy S13, it has the three essential services identified in policy S13 and is considered appropriate for a limited level of development. The site is located within Cullompton catchment area and therefore has possible off-site air quality impact within Cullompton AQMA. There are also possible concerns regarding developing new housing in close proximity to the M5 whereby noise impact may negatively affect residential amenity. A Public Right of Way runs through the site. The scale of development may also impact community facilities therefore on balance a significant negative effect is considered overall.	-3	The policy should require the provision of a buffer zone and appropriate planting to mitigate noise from the adjacent motorway. It should also require the retention and enhancement of the Public Right of Way. DM4 'Pollution' also provides some mitigation. As the policy requires 'enhancement' of the public right of way which is a slight positive impact but the scale	0

			of development may affect community facilities on balance a neutral effect is considered.	
I) Delivering the necessary infrastructure	An adequate access is achievable and numbers would be dependent on Transport Assessment of the junction with Silver St. Given the scale of development the site may need to deliver a large amount of road infrastructure. The Mid Devon Community Infrastructure Evidence Report indicates that the primary school can accommodate additional pupils arising from this development without expansion. Overall a negative and uncertain effect is considered given the potential for impact on highways and the need for a transport assessment.	-2	Policy S8 provides some mitigation by setting out that developers will be expected to contribute to, or bear the full cost of, new or improved infrastructure and facilities. The policy requires a transport assessment of capacity at the junction of Silver Street and Meadow. As mitigation is dependent on the outcome of the transport assessment a neutral although uncertain effect is considered.	0/?

Secondary/cumulative/synergistic effects:	The cumulative impacts of the development of this site has the potential to impact upon traffic, put pressure on services and facilities and the current provision of infrastructure. Development of this site in combination with other development in the local area could cumulatively lead to overcapacity issues in the local schools.
Temporary/permanent effects: Timescale: Short (1-5 years),	Within the short term, construction traffic associated with the development will

Medium (6-15 years) Long (15+ years)	increase traffic within Willand. Once completed, the development will be permanent.
Spatial extent: (District wide / local)	This site option will help meet housing needs.

**Alternative Option WI2: Willand Industrial Estate full site area option**

Land with a gross site area of 9.2 (ha) at Willand Industrial Estate, Willand is proposed for 22,000 sqm commercial floorspace.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	There are a number of protected trees in the site near the south eastern boundary. The site is hidden from the settlement by vegetation. The site area abuts the M5 and may be seen from the M5 if it is developed. The site falls within the 'Lowland plains' landscape character area and is typified as being an open, low lying flat landscape which is agriculturally prosperous. Given the loss of protected trees and potential visual impact of the site, a negative effect is considered.	-2	Policy S9 'Environment' and DM1 'High Quality Design' in the Local Plan Review provide mitigation for both the impact on the landscape and the natural environment a neutral effect. As the site may be visible from the M5 is developed a slight negative effect is considered.	-1
B) Protection and promotion of a quality built and historic environment	Previous archaeological work undertaken on this site demonstrated the presence of prehistoric activity within this site, a slight negative and uncertain effect. The location of the site, on the edge of the settlement adjoining existing commercial development is considered a sustainable location for employment growth. On balance a neutral effect is considered although there is some	-1	Archaeological investigation and mitigation is required by this policy, which improves the impact score, although this remains uncertain as the impact will depend on the	+1/?

	uncertainty remaining due to the potential impact on the area of prehistoric activity within the site.		results of the investigation. As the site is on the edge of the settlement adjoining existing commercial development and is considered a sustainable location for employment growth a slight positive effect is considered.	
C) Mitigating the effects of climate change	The site is located in flood zone 1 the lowest level of flood risk, a neutral effect. The site could contribute to surface water run off without appropriate mitigation measures, a slight negative effect. Willand has access to a bus service which could help reduce car travel and therefore carbon emissions. Given the potential issue around surface water run off but the benefit of a bus service on balance a neutral effect is considered.	0	A policy requirement in the Local Plan Review seeks the provision of a sustainable urban drainage scheme to deal with all surface water from the development. Given the mitigation of surface water run off a slight positive effect is considered as there is the benefit of a bus service.	+1
D) Safeguarding and minimising resource use	The site is located on part greenfield and part brownfield land, a neutral effect.	0		0
E) Promoting economic growth and employment	Option provides 22,000 sqm of commercial floorspace helping to diversify the economy, provide opportunities for local employees, reduce out-commuting and encourage inward investment, a positive effect.	+3		+3

F) Supporting retail	No impact.	0		0
G) Meeting housing needs	No impact.	0		0
H) Ensuring community health and wellbeing	Willand is a designated village under policy S13, it has the three essential services identified in policy S13 and is considered appropriate for a limited level of development. The allocation of commercial land within Willand could decrease air quality within the settlement through increased traffic movement and in particular HGV movements, a slight negative effect.	-1	DM4 Pollution provides mitigation, a neutral effect overall.	0
I) Delivering the necessary infrastructure	Much of the site infrastructure is already in place and there is existing access into the site which could be improved to cover the whole of the site, a neutral effect.	0		0

Secondary/cumulative/synergistic effects:	The cumulative impacts of the development of this site has the potential to impact upon traffic congestion.
Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Within the short term, construction traffic associated with the development will contribute towards traffic congestion within Willand. Once completed the development will be permanent.
Spatial extent: (District wide / local)	This site option will help meet the employment needs of Willand.

**Alternative Option WI2: Willand Industrial Estate residential 2.2ha, 53 dwellings**

Land with a gross site area of 2.2 (ha) at Willand Industrial Estate, Willand is proposed for 53 dwellings.

<b>Sustainability objective</b>	<b>Commentary</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Post Mitigation</b>
A) Protection of the natural environment	There are a number of protected trees in the site near the south eastern boundary. The site is hidden from the settlement by vegetation. The original site area abutted the M5 and may be seen from the M5 if it is developed. The site falls within the 'Lowland Plains' landscape character area and is typified as being an open, low lying flat landscape which is agriculturally prosperous. Given the loss of protected trees and potential visual impact of the site, a negative effect is considered.	-2	The site area has been redrawn to only include the south east section and therefore the visual impact of the development to be seen from the M5 has been minimised. Policy S9 'Environment' and DM1 'High Quality Design' in the Local Plan Review provide mitigation for both the impact on the landscape and the natural environment, overall a neutral effect is considered.	0
B) Protection and promotion of a quality built and historic environment	Previous archaeological work undertaken on this site demonstrated the presence of prehistoric activity within the site. The location of the site, on the edge of the settlement adjoining existing commercial development is considered a sustainable location for employment growth and subsequently, this is an unsuitable location for housing, being surrounded on three sides	-3/?	Archaeological investigation and mitigation should be required by this policy, which improves the impact score, although this remains uncertain as the impact will	-2/?



	by existing and forthcoming employment development. Overall the combined potential effect on the area of prehistoric activity within the site and the negative effect of the site being an unsuitable location for housing would lead to a significant negative and uncertain effect.		depend on the results of the investigation. However, as the site is an unsuitable location for housing, being surrounded on three sides by existing and forthcoming employment development, a negative and uncertain effect remains.	
C) Mitigating the effects of climate change	The site is located in flood zone 1 the lowest level of flood risk, a neutral effect. The site could contribute to surface water runoff without appropriate mitigation measures, a slight negative effect. Willand has access to a bus service which could help reduce car travel and therefore carbon emissions. Given the potential issue around surface water runoff but the benefit of a bus service on balance, a neutral effect is considered.	0	A policy requirement in the Local Plan Review seeks the provision of a sustainable urban drainage scheme to deal with all surface water from the development. Given the mitigation of surface water runoff a slight positive effect is considered as there is the benefit of a bus service.	+1
D) Safeguarding and minimising resource use	The site is located on part greenfield and part brownfield land, a neutral effect.	0		0
E) Promoting economic growth and	Option does not result in the loss or gain of employment land. A neutral effect.	0		0

employment				
F) Supporting retail	No impact.	0		0
G) Meeting housing needs	Option provides for approximately 53 dwellings, a contribution towards future housing needs, a positive effect.	+2		+2
H) Ensuring community health and wellbeing	Willand is a designated village under policy S13, it has the three essential services identified in policy S13 and is considered appropriate for a limited level of development. The allocation of housing land in Willand could decrease air quality within the settlement through increased traffic movement. The site is unsuitable for housing development as it is surrounded on three sides by existing and forthcoming employment development which would result in a negative impact on community cohesion and living environment. This would result in a combined significant negative effect.	-3	Policy DM4 'Pollution' in the Local Plan Review provides mitigation, however the location of the development cannot be mitigated as such a negative effect remains.	--2
I) Delivering the necessary infrastructure	Much of the site infrastructure is already in place and there is existing access into the site which could be improved to cover the whole of the site, a neutral effect. There is existing capacity in the local schools to accommodate development from this individual site. Overall a neutral effect is considered.	0		0

Secondary/cumulative/synergistic effects:	The cumulative impacts of the development of this site have the potential to impact upon traffic congestion.
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Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)	Within the short term, construction traffic associated with the development will increase traffic in Willand. Once completed, the development will be permanent.
Spatial extent: (District wide / local)	This site option will help meet housing needs.

## **Annex 4 – Revised Sustainability Appraisal of Plan**

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. Through the Local Plan Review Proposed Submission Consultation (2015) a number of alternatives were proposed, along with the presentation of new information. As a result a number of modifications to the proposed policies and supporting text of the plan are proposed. The full details of these proposed alternatives and new information are provided in annex 2 and 3. Annex 2 also sets out the reasons for selecting/rejecting the alternatives proposed. This annex summarises the main changes to the Local Plan Review following the appraisal of alternatives set out in annex 2, and assesses the overall sustainability of the Local Plan Review.

### **Strategic Policies**

#### **Policy S2: Amount and Distribution of development**

An alternative to amend the dwelling target to 7,860 to meet the objectively assessed housing need (OAN) with the additional housing requirements of Junction 27 is preferred due to new information presented in the finalised Strategic Housing Market Area report which became available during the consultation on the Local Plan Review Proposed Submission (2015) and following the Council decision on 22<sup>nd</sup> September 2016 to propose to allocate land at Junction 27 for a strategic scale employment site. Similarly the higher commercial growth scenario including the Junction 27 option is proposed as a modification to the plan.

#### **Policy S3: Meeting housing needs**

Updates to the policy are proposed given the change to the OAN suggested in policy S2.

#### **Policy S4: Ensuring housing delivery**

Updates to the policy are proposed given the change to the OAN suggested in policy S2.

#### **Policy S5: Public open space**

A change to the wording is proposed to clarify that the policy refers to the parish boundaries of the settlements noted.

#### **Policy S12: Crediton**

An additional criterion is proposed in the policy which is as follows ‘community and education facilities and other infrastructure to support the development proposed’ to reflect the need for a new primary school in Crediton.

## **Policy S14: Countryside**

The removal of reference to the provision of gypsy and traveller accommodation in this policy is proposed to ensure the Plan is in conformity with national policy in which the 'Planning Policy for Traveller Sites' (2015) which requires that new sites for travellers should be very strictly limited in open countryside that is away from existing settlements or outside areas allocated in the development plan.

## **Site Allocations**

### **Tiverton**

#### **TIV1-TIV5 Eastern Urban Extension**

The policy is proposed to be amended to consider a housing range of 1580-1830 which reflects the permissions granted on area A and the potential for increased density in area B.

#### **TIV14 Wynnards Mead**

The policy is proposed to be deleted to reflect new information regarding the historic environment and flood risk.

#### **OTIV4 Blundells School (Proposed for allocation TIV16)**

This site is proposed to be allocated following the Council decision on the 22<sup>nd</sup> September to allocate land at Blundells School for residential development. New information provided includes the support of developing the site from the Environment Agency which has resulted in this proposed policy scoring more positively than the option considered in the Local Plan Review Proposed Submission consultation (2015).

### **Cullompton**

#### **CU1-CU6 North West Cullompton**

Contributions from development to the Town Centre relief road and Junction 28 are proposed as modifications to the policy. In-line with the adopted North West Cullompton masterplan a change to the total commercial floorspace is proposed. The re-allocation of land to the south west of the site is also proposed.

#### **CU7-CU12 East Cullompton**

An additional criterion is proposed to ensure the setting of listed buildings adjoining the site is respected.

#### **CU19 Town Centre Relief Road**

Two additional criteria are proposed to ensure the protection of the setting of listed buildings and conservation area, and the provision of archaeological investigation and mitigation.

#### **CU20 Cullompton Infrastructure**

An additional criterion to state 'provision of works to reduce flood risk' has proposed as a modification to the plan.

### **Crediton**

#### **CRE2 Red Hill Cross, Exhibition Road**

Additional supporting text is proposed to reflect the recommendation in the HEA to provide appropriate mitigation for Shobrooke Park to the east.

#### **CRE3 Cromwells Meadow**

Additional supporting text is proposed to reflect the recommendation in the HEA to provide appropriate mitigation for Shobrooke Park to the east. An additional criterion is also proposed to ensure archaeological investigation and mitigation.

#### **CRE4 Woods Group**

Additional supporting text is recommended which identifies non-listed heritages within the site.

#### **CRE5 Pedlerspool**

Amendment to the policy is made which includes the provision of a new school but removes the extra care scheme element in the policy.

#### **CRE7 Stonewall Lane**

A change to the supporting text of the Plan is recommended to ensure that adequate landscaping is provided to protect the heritage assets associated with the adjoining Creedy Park.

#### **CRE10 Land south of A377**

A change to the policy is proposed to include a small area to the south of the allocation up to the edge of the swale, covered by recent consent sought by Mole Avon. Although the scoring is lower for the pre-mitigation score of objective c) mitigating the effects of climate change, it is considered appropriate and reasonable to allocate the original site area which has outline consent. Detailed design to mitigate flood risk will be considered at the reserved matters planning application stage. Mitigation through sensitive design with appropriate

choice of materials and landscaping is also recommended for inclusion within the policy. An amendment to the supporting text is further proposed to make reference to the latest flood data and implications from redevelopment with mitigation measures such as layout, site and flood levels.

### **CRE11 Crediton Infrastructure**

The following criterion is proposed for inclusion 'provision of works to reduce flood risk'.

## **Junction 27**

### **Junction 27, M5 Motorway**

An additional policy is proposed to reflect the Council decision on 22<sup>nd</sup> September 2016 to allocate land for tourism, leisure and retail at Junction 27 of the M5 motorway. Changes to the policy are reflected in the sustainability appraisal.

## **Rural Areas**

### **School Close, Bampton**

An allocation for 0.54(ha) 26 dwellings is proposed as a modification to the Plan. The site is currently allocated and was omitted in error as some of the site has been built out. For consistency, similar to other sites in the plan, the remaining area of the allocation which has not yet been built is proposed to remain as an allocation in the Plan.

### **CH1 Barton, Chawleigh**

An additional criterion to state 'design solutions which respects the setting of the conservation area and listed building' is proposed. An amendment to the supporting text is also proposed to ensure appropriate landscaping to mitigate any potential impact on the conservation area and listed buildings.

### **CF1 Barnhill Close, Cheriton Fitzpaine**

An additional criterion to minimise the impact on the conservation area and listed building is proposed.

### **HA1 Land adjacent Fishers Way, Halberton**

An amendment to policy HA1 is proposed to delete reference to the need to 'archaeological investigations and appropriate mitigation measures' given the new information provided by the Devon County Council Archaeology Team that the proposed allocation will not impact on any known heritage assets and state that they would not need to be consulted should an application come forward. The addition of a criterion to ensure mitigation through

appropriate design, materials and landscaping is proposed to protect the setting of Halberton conservation area is also proposed.

### **HE1 Depot, Hemyock**

This site is proposed for deletion given the representations made during the Local Plan Review Proposed Submission (2015) consultation raises an issue with the deliverability of the site during the plan period and is therefore no longer considered a reasonable alternative. The site will have a limited impact on the Local Plan as a whole given its size of 10 dwellings and may still come forward as a windfall site as it falls within the settlement limit.

### **NE1 Court Orchard, Newton St Cyres**

A change to the policy and supporting text is proposed to ensure design which respects the setting of the conservation area.

### **OSP1 Higher Town, Sampford Peverell (Proposed for allocation SP2)**

This site is proposed to be allocated following the Council decision on the 22<sup>nd</sup> September to allocate land at Higher Town for residential development. Since the proposed submission SA there has been confirmation that access is achievable and therefore the uncertainty has been removed.

### **OUF3 Land west of Uffculme (Proposed for allocation UF1)**

A change to the plan is proposed to allocate this site given a 2016 appeal decision (APP/Y1138/W/15/3025120) allowing outline planning permission for a site of 3.49ha with 60 dwellings. Conclusions in the inspectors report have fed into the sustainability appraisal in which objectives b) built and historic environment and h) ensuring community health and wellbeing score more positively.

### **WI2 Willand Industrial Estate**

The full allocation of 9.2ha, 22,000sqm of commercial floorspace is proposed to be allocated given that the Council's original reasons for not allocating the full site have been addressed as the remainder of the site is now deliverable.

### **Managing Development**

#### **DM28 Other protected sites**

The inclusion of reference to compensatory measures is proposed as a change to the policy to raise that in some cases where mitigation measures are not possible then compensatory measures may be appropriate.



## **Secondary/Cumulative/Synergistic impacts**

### **Tiverton**

Additional detail has been provided in the supporting text of S10 to reflect the cumulative traffic impacts on Junction 27 to be considered.

### **Cullompton**

Additional criterion and supporting text has been included under a number of Cullompton allocation policies to reflect the cumulative impact on the road network.

### **Crediton**

Additional text is provided in CRE7 to recognise the need for a Transport Assessment that will comprehensively assess the transport issues related to the development of the site, taking into account the potential cumulative impact of nearby allocations.

### **J27 Commercial Development**

Additional evidence since the previous SA was commissioned specifically to examine the potential related housing implications of the proposed strategic scale employment site at Junction 27 on the M5 motorway. The results suggest a need of an additional 260 dwellings within Mid Devon District Council over the plan period. A Habitat Regulations Assessment of the Mid Devon Local Plan Review including Junction 27 has been undertaken which concludes that the J27 site allocation, alone or in combination with the Local Plan proposals, will not have an adverse effect on the integrity of the Culm Grasslands SAC.

## **Overall Sustainability of the Local Plan Review**

In this latest update to the SA, changes to the Plan are proposed to take into account comments from representations, additional reasonable alternatives considered and new information presented including the latest national policy changes. Updates from the latest appeal decisions and planning applications have also been taken to account to ensure policies proposed are as up-to-date as possible.

Of the changes, the majority propose minor alterations to the proposed policies or supporting text. The main amendments to the Plan include the proposed allocation of land at Junction 27 of the M5 motorway and associated housing and an amended housing total to reflect the most recent evidence on the housing needs in the area. OSP1, Sampford Peverell (proposed as SP4 within the plan) and OTIV4, Blundells School (proposed as TIV16 within the plan) are proposed for allocation in response to the housing implications of allocating the strategic scale employment site at Junction 27 of the M5 motorway. The option to include Junction 27 presents a significant positive impact on promoting economic

growth and employment. Controls are set in policy to ensure aspects such as retail development is supported, necessary infrastructure is delivered and housing need is met. As such overall it is considered to result in a positive impact on the plan.

Wynnards Mead, Tiverton (contingency site) is proposed for deletion due to new evidence provided in relation to issues around flooding and the historic environment. School Close, Bampton (proposed as BA4 within the plan) has been included, which was previously omitted in error. HE1 Deport, Hemyock is proposed for deletion due to an issue of its deliverability within the plan period. OUF3 Land West of Uffculme is also included as an allocation following a 2016 appeal decision (APP/Y1138/W/15/3025120), allowing outline planning permission for a site of 3.49ha with 60 dwellings. Also the full allocation of 9.2ha, 22,000sqm of commercial floorspace is proposed at Willand Industrial Estate given that the Council's original reasons for not allocating the full site have been addressed as the remainder of the site is now deliverable.

In general, the emerging Local Plan Review has been found to have a wide range of positive and significant positive effects on the objectives both cumulatively and through individual policies, although a number of potentially adverse impacts still remain. Recommendations made in previous iterations of the SA report and this updated SA report as well as controls through policy has provided mitigation for potential adverse effects. Of the main changes proposed in this iteration of the SA, the main negative impact on the Local Plan Review as a whole is the deletion of a contingency site (Wynnards Mead, Tiverton). The deletion of this policy reduces the flexibility of the Plan as a whole given the role of contingency sites in ensuring housing delivery during the Plan period. However on balance the sustainability issues of the site outweigh the benefit of the inclusion of the contingency site. Two other contingency sites in the plan remain and therefore flexibility still remains in the Plan. The other changes to the Plan are considered largely beneficial with the new information and therefore amount to an overall positive effect.