



Environmental Planning
Design & Management

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Dear

SA/SEA Scoping for the Cranbrook Plan DPD

1. This letter is seeking your view on the scope of the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) of the Cranbrook Plan Development Plan Document (DPD), referred to in this letter as 'the Cranbrook Plan', which is being produced by East Devon District Council working in conjunction with Savills. The Cranbrook Plan will form part of the East Devon Local Plan, which is currently at the Examination stage. The Cranbrook Plan will identify suitable and appropriate land to allocate and will set out the proposed form and nature of future development within the Cranbrook Plan area.
2. In line with Government guidance¹, an integrated SA and SEA process is being undertaken in relation to the Cranbrook Plan. Therefore, throughout this letter the term 'SA' should be taken to mean 'SA incorporating the requirements of the SEA Directive'.

SA Scoping

3. Scoping is the first stage in the SA process, with the purpose of setting the context and objectives, establishing the baseline and deciding on the scope of the SA. The tasks involved in the Scoping stage include:
 - Identifying other relevant policies, plans and programmes and sustainability objectives.
 - Collating baseline information.
 - Identifying sustainability issues and problems.
 - Developing the SA framework
 - Consulting on the scope of the SA.
4. Given the narrow scope of the Cranbrook Plan, plus the fact that a detailed SA Scoping consultation has already been undertaken for the East Devon Local Plan, instead of preparing a full Scoping Report LUC has set out the scope of the SA work for the Cranbrook Plan in the form of this Scoping letter for consultation with the statutory environmental bodies. This letter seeks to meet the requirements of the SEA Regulations in relation to this DPD as efficiently as possible.

¹ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

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5. LUC is currently undertaking SA work for East Devon District Council in relation to its emerging Local Plan. That SA work is being drawn on as appropriate during the SA of the Cranbrook Plan, to avoid unnecessary duplication. The most recent iteration of the SA report for the Local Plan was produced in August 2015 and relates to the submitted Local Plan, also taking into account the changes that have been proposed since then.

Outline of the Plan and relevant policy context

6. The first stage of production of the Cranbrook Plan was to consult on the matters and subjects that it might contain and address. In June 2015, East Devon District Council consulted organisation and individuals on the Planning Policy database that may have an interest in future Cranbrook development, by outlining what the Cranbrook may cover and seeking views on any alternative or additional issues that should be addressed. The consultation stated that the Cranbrook Plan might cover the topics listed below²:
 - Allocate specific sites and land areas for new development;
 - designate land for 'protection' or safeguarding which will prevent of limit development;
 - include policies, cross-referencing where appropriate to specific land areas, in respect of development of:
 - a) new homes;
 - b) gypsy and traveller accommodation;
 - c) community facilities;
 - d) education facilities;
 - e) sports and play areas and facilities;
 - f) shops;
 - g) parks and open space;
 - h) places of employment; and
 - i) other possible uses not detailed above.
 - establish the supporting infrastructure and means for its delivery required by the above uses;
 - establish forms and principles of development and materials and design standards to promote the highest quality outcomes;
 - define mitigation required to off-set potential adverse impacts that might otherwise arise as a consequence of development;
 - determine mechanisms for monitoring the success and quality of what is happening and being built and set targets; and
 - determine whether planning applications submitted to the Council should be granted planning permission and what conditions might apply.
7. There are a wide range of relevant plans, policies and programmes that shape the policy context in which the Cranbrook Plan is being prepared. These have been reviewed in detail as part of the SA of the East Devon Local Plan, and the most relevant issues for the Cranbrook Plan specifically are summarised below.

² <http://eastdevon.gov.uk/planning/planning-policy/emerging-plans-and-policies/the-cranbrook-plan-development-plan-document-2015/>

8. The Cranbrook Plan must be in line with national policy as set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance and will also need to be in conformity with the emerging East Devon Local Plan, which is now at a late stage in its preparation. The Local Plan allocates land for development at Cranbrook (Strategy 9: Major Development at East Devon's West End and Strategy 12: Development at Cranbrook). Any additional development land that is allocated in the Cranbrook Plan would need to be within the wider Cranbrook Plan area that is allocated in Strategy 12 of the emerging East Devon Local Plan. The Local Plan policies also set out criteria that will apply to all new development at the West End of the District, including at Cranbrook (Strategy 10: Green Infrastructure in East Devon's West End and Strategy 11: Integrated Transport and Infrastructure Provision at East Devon's West End). Therefore, policies within the Cranbrook Plan must be in conformity with these and other strategic Local Plan policies, as well as the general development management policies in Section 2 of the Local Plan.
9. The Cranbrook Plan must also be in line with European SEA Regulations³ and Habitat Regulations⁴, and this SA/SEA Scoping letter forms the first stage in meeting the SEA requirements.

Habitats Regulations Assessment

10. The latest Habitats Regulations Assessment (HRA) work for the Local Plan is the August 2015 HRA Report, which has taken into account all of the proposed changes to the Local Plan as submitted in 2013, including the most recent proposed changes (August 2015). It concluded that, in light of the August 2015 proposed changes which reflect discussions between EDDC and Natural England, the Local Plan accords with the requirements of the Habitats Regulations, and parent European Directives, i.e. the implementation of the Plan would not have likely significant effects on the integrity of any of the European sites in and around East Devon. As the Cranbrook Plan is not seeking to provide for residential development in excess of that provided for through Local Plan policy, it is considered unlikely to have additional significant effects, and mitigation measures included in the South East Devon European Site Mitigation Strategy⁵ (see below) should help to reduce the likelihood of significant effects occurring from implementation of the Cranbrook Plan. Should Cranbrook expand beyond the Local Plan proposed size, further HRA work could be required for the Cranbrook Plan.

Baseline Information

11. Baseline information provides the context for assessing the sustainability of proposals in the Cranbrook Plan and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. The requirements for baseline data vary widely, but it must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records which are sufficient to identify trends. Annex 1(f) of the SEA Directive requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors.
12. Baseline information for the whole of East Devon District has been collated and regularly updated throughout the SA of the East Devon Local Plan and has been consulted on as part of the SA process. Key baseline information about the Cranbrook area specifically is summarised below.

³ The Environmental Assessment of Plans and Programmes Regulations 2004.

⁴ The Conservation of Habitats and Species Regulations 2010.

⁵ South-east Devon European Site Mitigation Strategy. Footprint Ecology. June 2014.

Some of the information has been drawn from that gathered for the production of the Cranbrook Plan itself, as well as from datasets held by LUC (e.g. information about the proximity of flood zones and designated biodiversity sites).

13. Cranbrook is a rapidly developing new town in East Devon, close to the City of Exeter. By mid-2015 around 1,000 new homes had been built and were occupied. The emerging East Devon Local Plan proposes the expansion of Cranbrook up to 2031 to accommodate nearly 8,000 new homes. This scale of development would make Cranbrook the second biggest town in East Devon, after Exmouth.
14. On the basis of its current extent, Cranbrook is located approximately 2.5km to the east of Exeter at the nearest point, and is approximately 600m to the north of the Exeter Airport site. The railway line to the east of Exeter runs along the northern boundary of Cranbrook.
15. Cranbrook is being developed as a new town, to include employment land and services and facilities alongside the new housing. A new healthcare facility, Cranbrook Medical Practice, opened in spring 2015 and a new primary school, St Martins Primary, has also opened to serve the growing population. A second primary school and the first secondary school at Cranbrook are also opening in September 2015 at the new Cranbrook Education Campus. A respondent to the recent consultation on the Cranbrook Plan noted that Cranbrook is a very community spirited town with lots of activities going on.
16. There are no designated biodiversity sites within very close proximity of Cranbrook, although the East Devon Pebblebed Heaths Special Area of Conservation (SAC) and East Devon Heaths Special Protection Area (SPA) are approximately 3.5 km to the south east and the Exe Estuary SPA and Ramsar site is approximately 6.5 km to the south west. These sites are highly sensitive and the qualifying species and habitats that they are designated for are vulnerable to human pressures including recreation and general disturbance. In partnership with Natural England, the council and its neighbouring authorities of Exeter City Council and Teignbridge District Council have determined that housing and tourist accommodation developments in their areas will in combination have a detrimental impact on the Exe Estuary SPA and East Devon Pebblebed Heaths SAC through impacts from recreational use. The impacts are highest from developments within 10 km of these European sites, and the Cranbrook Plan area falls within 10 km of both. The three Councils have prepared the South East Devon European Site Mitigation Strategy⁶, which sets out a joint approach to mitigating the potential significant effects on the SAC and SPA including delivery of suitable alternative natural greenspace (SANG) sites to try to encourage dog walking and other recreation away from the sensitive European sites.
17. The Cranbrook development area is located some distance from the AONBs in East Devon, being approximately 4km from the East Devon AONB to the south/south east and 10km from the Blackdown Hills AONB to the east. Cranbrook lies in the 'lowland plains' landscape character type, as identified in the East Devon Landscape Character Assessment⁷. This area comprises low lying land adjacent to river valleys. It is flat and in mixed cultivation, with a variety of field size and pattern. Wide hedges, often elm-dominated, and hedgebanks are distinctive, often with prominent hedgerow oaks.

⁶ South-east Devon European Site Mitigation Strategy. Footprint Ecology. June 2014.

⁷ East Devon and Blackdown Hills Areas of Outstanding Natural Beauty and East Devon District Landscape Character Assessment and Management Guidelines (2008)

18. Most of Cranbrook lies outside of high flood risk zones, although there are areas of flood zones 2 and 3 which extend within the area that is allocated in the emerging East Devon Local Plan, across the northern boundary and through the centre of the area. Much of the Cranbrook development area is within Grade 3 agricultural land, although it is not known if this is Grade 3a or 3b. The northern part of the site is within Grade 4 agricultural land.
19. Rockbeare Manor Registered Park and Garden is located approximately 500m to the south east of Cranbrook and there are a number of listed buildings within and around the development area. Approximately 5km to the north west is the National Trust estate at Killerton (a Grade II listed Park and Garden).
20. There are no Air Quality Management Areas within or near to Cranbrook – the only one that has been declared in East Devon is within Honiton, further to the east. The proximity of Exeter Airport to the south of Cranbrook means that noise could potentially be a concern, as well as other possible impacts associated with airport operation.

Key Environmental and Sustainability Issues

21. Consideration of the policy context and baseline information enables the identification of key environmental and sustainability issues for the Cranbrook area, which will need to be taken into account in the SA of the Cranbrook Plan. These are largely similar to the key issues facing the wider District, although some are specific to Cranbrook and include:
 - The need to ensure that large-scale new development is appropriately integrated into the landscape, respecting and enhancing local character where possible.
 - The need to protect biodiversity (in particular the Exe Estuary SPA and East Devon Pebblebed Heaths SAC) from the impacts of large-scale development in the area, in particular increased recreation pressure.
 - High flood risk in some parts of the development area.
 - The need to conserve and enhance the setting of listed buildings and other heritage features.
 - The need to avoid high levels of car use by balancing residential development with an appropriate range of employment opportunities, services and facilities.

SA Framework

22. The development of a set of SA objectives is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared, with each proposal in the plan being scored against each SA objective. It is considered appropriate to make use of the SA framework that is being used for the SA of the East Devon Local Plan as those objectives have been designed to address the key sustainability issues facing East Devon District, which are also relevant at the local level for Cranbrook. The SA framework, which has been consulted on throughout the SA of the Local Plan, is presented in **Table 1**, which also notes which of the SEA topics each objective addresses.

Assessment methodology for the Cranbrook Plan

23. All of the options for the Cranbrook Plan, including any reasonable alternative options, will need to be subject to SA. This will therefore include strategic options for the overall development of the area, specific site options if there are choices to be made and any options that there may be for policies to be included in the Plan. The SA work for the Cranbrook Plan will be undertaken in the

context of the SA work that has already been undertaken in relation to the allocated land, during the preparation of the emerging East Devon Local Plan.

24. Each policy and/or site option will be subject to SA using broadly the same methodology as we have used for the SA of the Local Plan, i.e. setting out the assessment of each policy or site option in a matrix with a score and a brief justification for that score being given for each objective.
25. We will also make use of the Published Map File (PMF) that we produced for use in the SA of the Local Plan site options, which is an interactive electronic map of the district showing a number of different geographical features (e.g. urban areas, transport routes, nature conservation and cultural heritage designations, flood zones etc.). Data showing the location and boundaries of all options for development within the wider Cranbrook area will be added to the PMF, and will enable the SA team to consider the proximity of the site options to potential sensitive receptors or other constraints/opportunities for development.

Table 1: SA Framework for the Cranbrook Plan

SA Objective	SEA Topic(s)
1. To ensure everybody has the opportunity to live in a decent home.	Population, human health, material assets.
2. To ensure that all groups of the population have access to community services.	Population, human health, material assets.
3. To provide for education, skills and lifelong learning	Population, material assets.
4. To improve the population's health	Population, human health.
5. To reduce crime and fear of crime.	Population, human health.
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	Population, human health.
7. To maintain and improve cultural, social and leisure provision.	Population, material assets.
8. To maintain and enhance built and historic assets.	Cultural heritage including architectural and archaeological heritage.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	Soil, landscape.
10. To maintain the local amenity, quality and character of the local environment.	Fauna, flora, soil, water, air, landscape.
11. To conserve and enhance the biodiversity of East Devon.	Biodiversity, fauna, flora.
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	Human health, air.
13. To maintain and enhance the environment in terms of air, soil and water quality.	Soil, water, air.
14. To contribute towards a reduction in local emissions of greenhouse gases.	Air, climatic factors.
15. To ensure that there is no increase in the risk of flooding.	Water, human health, material assets.
16. To ensure energy consumption is as efficient as possible.	Climatic factors.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	Material assets.
18. To maintain sustainable growth of employment for East	Population, material assets.

SA Objective	SEA Topic(s)
Devon, to match levels of jobs with the economically active workforce.	
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	Population, material assets.
20. To encourage and accommodate both indigenous and inward investment.	Population, material assets.

SA Report

26. Once the SA matrices are finalised the findings will be compiled into a draft SA report. This will be structured so as to meet all of the requirements of Annex 1 of the SEA Directive, and will include:
- 1 An outline of the contents of the Cranbrook Plan and its relationship with other relevant plans, policies and programmes (including in particular its relationship with the emerging East Devon Local Plan).
 - 2 The environmental, social and economic characteristics of the Cranbrook area, including any problems or issues and their likely evolution without the Cranbrook Plan (in many cases the policies in the emerging Local Plan are likely to address the issues to some extent).
 - 3 Key environmental, social and economic policy objectives set at the international, national and local level of relevance to the Cranbrook Plan.
 - 4 The SA framework being used for the SA of the Cranbrook Plan.
 - 5 The reasonable alternatives considered, including how they performed in sustainability terms and an outline of East Devon District Council's reasons for selecting particular options for inclusion in the Cranbrook Plan.
 - 6 Any difficulties encountered during the SA process, e.g. data limitations.
 - 7 The significant effects of the Cranbrook Plan on each of the SA objectives, taking into account mitigation (which may be provided by policies in the Cranbrook Plan and emerging Local Plan).
 - 8 A proposed monitoring framework for monitoring the significant effects identified (this is likely to link closely with the monitoring framework for the emerging Local Plan).
 - 9 A Non-Technical Summary which summarises all of the above.
27. The SA report will also include an appendix setting out the Scoping consultation comments received and noting how each one has been addressed in the full SA report (e.g. any resulting amendments made to the SA objectives or baseline information).

Consultation and Next Steps

28. The SEA Regulations require a local authority to consult the statutory environmental bodies (Historic England, the Environment Agency and Natural England) regarding the scope of an SA/SEA for a minimum of five weeks. On behalf of East Devon District Council, LUC is now inviting comments on the scope of the SA as set out in this letter. In particular, the consultees are requested to consider:
- Whether there are any additional plans, policies or programmes that are particularly relevant to the SEA of the Cranbrook Plan.

- Whether the baseline information provides a suitable baseline for the SEA of the emerging Cranbrook Plan.
 - Whether there are any additional key sustainability issues that should be included.
 - Whether the SA framework is appropriate and includes a suitable range of objectives (note that the framework has already been consulted on in relation to the SA/SEA of the Local Plan).
29. The responses from this consultation will be reviewed and taken into account during the assessment of the Cranbrook Plan against the SA objectives. The SA report will explain how any consultation responses have been addressed.
30. Please return your comments by 30th October 2015 to myself, either at the address at the top of this letter or via e mail to the address below.

Yours sincerely,

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