

# **Sustainability Appraisal of the Cranbrook Masterplan**

**Prepared by:**

**Planning Policy Section  
East Devon District Council  
October 2017**

**It should be noted this draft of the Sustainability Appraisal has been prepared in support of the proposed Cranbrook Masterplan as presented to East Devon District Council - Strategic Planning Committee on 6 November 2017.**

**If Committee endorse the Masterplan for consultation as currently drafted, or any changes made prior to consultation are considered immaterial in respect of this appraisal, then this draft of the appraisal will be made available alongside the plan for consultation.**

**If committee make any changes to the draft plan that are considered material to the wording in this appraisal then the appraisal may be subject to amendment by officers who may note and comment on changes made to the Masterplan.**

**In the draft of the appraisal that is consulted on - this box, the text in this box and the header to the document will be deleted or amended as appropriate.**

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## 1 Introduction

- 1.1 This Sustainability Appraisal has been prepared by officers of East Devon District Council as part of an integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Cranbrook Masterplan. The appraisal relates specifically to the Masterplan, dated October 2017, and it should be read in conjunction with that report, its supporting evidence documents and the proposed policies that are identified for inclusion in the future publication draft of the Cranbrook plan. The appraisal does, however, also cross reference back to previous stages of appraisal and overall Cranbrook Plan making work.
- 1.2 The Cranbrook Plan, the evidence behind it and wider evidence and research will, in due course, inform production of a more detail planning policy document for Cranbrook - the Cranbrook Plan. The Cranbrook Plan will be published in 2018.
- 1.3 In preparing this appraisal East Devon District Council has employed the consultancy firm of LUC as a 'critical friend' to review the form, approach and content of the work and offer advice and guidance. The format of this appraisal is informed by a standard approach adopted by LUC but it is stressed that content and 'ownership' rests with East Devon District Council. LUC have been assisting East Devon District Council through previous stages of SA work on the Cranbrook Plan.

### Cranbrook in summary

- 1.4 Cranbrook is a rapidly developing new town in East Devon. It will include employment land and other services and facilities alongside new housing. By spring 2017 around 1,500 new homes had been built and were occupied at Cranbrook. The East Devon Local Plan proposes the expansion of Cranbrook up to 2031 to accommodate close to 7,800 new homes. This scale of development will make Cranbrook the second biggest town in East Devon, after Exmouth.
- 1.5 Cranbrook, on the basis of its current extent and at its nearest point, is located approximately 3 kilometres to the east of the Exeter City Council boundary and the M5 Motorway and just over one kilometre north of the main runway at Exeter Airport. The Exeter-Waterloo railway line runs along the northern boundary of Cranbrook.

### The Cranbrook Plan - development plan document and the masterplan

- 1.6 This current stage of SA work is most specifically relevant to the Cranbrook masterplan but through further work (going into 2018) the Masterplan will be complemented by and in part superseded by the Cranbrook Plan development plan document (DPD). That will be a formal planning policy document that will guide future development of the new town, the DPD will be known as the 'Cranbrook Plan'. In this SA work there are references made to appraisal of both the Masterplan and the Cranbrook Plan. The Cranbrook Plan references in this report, especially where made in the context of SA process, reflect the wider overall work that will in due course be relevant to the Cranbrook Plan overall and this overall work includes the masterplan as a specific plan making stage.

- 1.7 The East Devon Local Plan was adopted in January 2016 and it sets out the broad framework for development across the whole of East Devon, including at Cranbrook, and it covers the period up to 2031. The Cranbrook Plan will provide more policy detail and allocate land for the future development of the town. It should be noted that in earlier work it was called the ‘Cranbrook Development Plan’. In subsequent drafts, and in this work, reference to the term ‘Development’ have been dropped to make things simpler and the plan is now therefore referred to as the Cranbrook Plan.
- 1.8 Prior to producing a proposed DPD document (i.e. an explicit actual planning policy document) the Council commissioned the production of the Masterplan for Cranbrook. The Masterplan, and technical evidence that has informed its production, will be the chief evidence to inform the Cranbrook Plan. The Masterplan and the proposals within in it form the subject of this appraisal.

### The role of Sustainability Appraisal and Strategic Environmental Assessment

- 1.9 Sustainability Appraisal is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.
- 1.10 Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive<sup>1</sup>, transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA)<sup>2</sup>. The purpose of SEA, as defined in Article 1 of the SEA Directive is *‘to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development’*.
- 1.11 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. National Planning Practice Guidance<sup>3</sup> shows how it is possible to satisfy both requirements by undertaking a joint SA/SEA process, and to present an SA report that incorporates the requirements of the SEA Regulations. The SA/SEA of the Cranbrook Masterplan and subsequently the Cranbrook Plan is and will be prepared in line with this integrated approach and throughout this report the abbreviation ‘SA’ should be taken to refer to ‘SA incorporating the requirements of SEA’.

### Timetable for Cranbrook Plan production and for SA work

- 1.12 The timetable for key stages of Cranbrook Plan production and for stages of SA work are set out in the summary table below and more significant stages are referred to in more detail in this chapter

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<sup>1</sup> SEA Directive 2001/42/EC

<sup>2</sup> Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

<sup>3</sup> <http://planningguidance.planningportal.gov.uk/>

and elsewhere in this report. Dates, from 2018 onward, which are shaded in grey are projected. It should be noted that this timetable and the description of the document being consulted on varies from the Councils Local Development Scheme (as adopted in July 2017) – see:

<http://eastdevon.gov.uk/media/2177845/local-development-scheme-july-2017-ver-02.pdf>

**Table 1.1 – Key Stages in Cranbrook Plan Production**

Date	Cranbrook Plan Making Stages and other key events	SA stage and commentary
June 2015	Decision, in principle, taken to prepare Cranbrook Plan.	There was no SA work at this stage.
2015	Savills first commissioned to produce a Cranbrook Masterplan.	There was no SA work at this stage.
July to August 2015	Regulation 18 Consultation.	There was no SA work at this stage.
January 2016	East Devon Local Plan adopted – this committed to production of the Cranbrook Plan.	There was a full SA of the Local Plan.
June to July 2016	Cranbrook Plan Issues and Options report consulted on.	This issues and Options Report was subject to an SA report that evaluated alternative option.
November 2017	Cranbrook Masterplan and wider evidence, specifically including this SA, consulted on.	This SA report published for comment alongside the Cranbrook Masterplan and other evidence documents.
Early 2018	Feedback from consultation and further evidence used to inform the Cranbrook Plan.	Ongoing SA work and consultation feedback used to inform the actual Cranbrook Plan and its policy.
Spring 2018	Publication of the Cranbrook Plan (with proposed six weeks consultation).	An SA report of the Cranbrook Plan will be published for consultation.
Early summer 2018	Cranbrook Plan Submission.	The SA documents will form part of the submission.
Summer/ Autumn 2018	Examination Hearing Sessions.	SA documents will form part of the examination.
Later in 2018	Cranbrook Plan Adoption.	A full final SA report will accompany plan adoption.

### The Cranbrook Masterplan and early stages work

- 1.13 East Devon District Council first commissioned Savills to produce a masterplan for Cranbrook in 2015. The first stages of masterplan work involved evidence gathering and stakeholder engagement, specifically including a series of stakeholder workshops and technical meetings. These helped narrow down a list of priorities for Cranbrook and to identify reasonable options for the Plan. The initial phases of work by Savills stretched from 2015 into 2016.
- 1.14 The final Masterplan was completed in October 2017 and comprises of an overarching plan for the new town and supporting text that set out a spatial picture for the future development of



Cranbrook. The masterplan, and evidence and assessment behind it is the subject of the November 2017 consultation, and it will form the key evidence that will subsequently be used to inform the Cranbrook Plan.

### Initial (Regulation 18) Cranbrook Plan consultation

- 1.15 The first formal stage of preparing the Cranbrook Plan (under Regulation 18 of the plan making regulations) took place in June 2015. East Devon District Council consulted organisations and individuals on the Planning Policy database who may have an interest in the future of Cranbrook development, outlining what the Cranbrook Plan may cover and seeking their views on any alternative or additional issues that should be addressed. **Appendix 1** of this appraisal provides details of the matters raised at this consultation and a summary of comments received.

### Scoping letter for the Cranbrook Plan

- 1.16 The SA process began in September 2015 with the production of a Scoping Letter for the Cranbrook Plan. **Chapter 2** of this report provides specific commentary on this stage of work.

### Cranbrook Issues and Options consultation report 2016 and its SA

- 1.17 In June and July 2016 the Council issued a Cranbrook Issues and Option report for consultation<sup>4</sup>. The Issues and Options document set out an overall Vision and Strategic Objectives and outlined issues that could affect the development of a sustainable new town at Cranbrook. Although the Issues and Options report did not present specific options for addressing those issues it did allude to some high level alternative approaches that could be taken forward in the Plan. The Issues and Options report also set out four alternative scenarios (essentially diagrammatic plans for possible future development areas with differing densities) which relate to the spatial development of the town.
- 1.18 An SA report was produced in support of the Issues and Options report. Chapter 4 of this report provides details of the SA of the Issues and Options Report and also of consultation feedback.

### Cranbrook Masterplan and SA consultation 2017

- 1.19 In November 2017 a recommendation will be presented to Strategic Planning Committee of East Devon District Council proposing that the Council consult on the Cranbrook Masterplan. Alongside the masterplan and its supporting evidence documents this SA report will also be available for people to comment on.
- 1.20 The intent is that following consultation and any further evidence gathering and assessment the Masterplan will inform the subsequent Cranbrook Plan.

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<sup>4</sup> <http://eastdevon.gov.uk/media/2218860/cranbrook-io-160609-final-lr.pdf>

## Structure of this report

1.21 This report is an SA report of the Masterplan. **Table 1.2** below signposts how the requirements of the SEA Regulations have been met within this SA report.

**Table 1.2: Requirements of the SEA Regulations and where addressed in this SA Report**

SEA Regulation Requirements	Where covered in this SA report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Reg. 12 and Schedule 2):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes	Chapter 3
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Chapter 3
c) The environmental characteristics of areas likely to be significantly affected	Chapter 3
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Chapter 3
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation	Chapter 3
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects (see note after the this table for an explanation of the terms)	Chapter 3
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapters 5 to 8
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 5 to 8
i) A description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 9

SEA Regulation Requirements	Where covered in this SA report
j) a non-technical summary of the information provided under the above headings	A separate non-technical summary document will be prepared to accompany the SA report for the Publication version of the Cranbrook Plan.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2)	Addressed throughout this SA report.
<b>Consultation:</b> <ul style="list-style-type: none"> <li>authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4)</li> </ul>	A Scoping consultation for the SA of the Cranbrook Plan was undertaken between September and October 2015.
<ul style="list-style-type: none"> <li>authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</li> </ul>	Consultation is being undertaken in relation to the Cranbrook Masterplan between 10 November 2017 and 8 January 2018 and will continue to be for all future iterations of the Plan. The current consultation document is accompanied by this SA report.
<ul style="list-style-type: none"> <li>other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).</li> </ul>	N/A

SEA Regulation Requirements	Where covered in this SA report
<b>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)</b>	
<p><b>Provision of information on the decision:</b> When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>- the plan or programme as adopted</li> <li>- a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>- the measures decided concerning monitoring (Art. 9)</li> </ul>	To be addressed after the Cranbrook Plan is adopted.
<p><b>Monitoring</b> of the significant environmental effects of the plan's or programme's implementation (Art. 10)</p>	To be addressed after the Cranbrook Plan is adopted.
<p><b>Quality assurance:</b> environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).</p>	This report has been produced in line with current guidance and good practice for SEA/SA and this table demonstrates where the requirements of the SEA Directive have been met.

**Note on item f)** - by way of definition terms used can be interpreted as:

- **Secondary** – are impacts that are not a direct consequence or product of an action or policy but are outputs that arrive indirectly;
- **Cumulative** – are the summation of impacts from a number of actions or policies;
- **Synergistic** – are results where two or more policies or actions interact with one another to generate impacts;
- **short term** – whilst not defined in this work with reference to specific time periods these are impacts that occur quickly – frequently they will be temporary;.
- **medium term** – these are somewhat longer term impacts.
- **long-term term** – these are impacts that occur over a long time period and which will frequently be permanent;
- **permanent** - impacts that are around for a long time;
- **temporary** – impacts that do not last for a long time
- **positive** – where the impacts have desirable outcomes; and
- **negative** – where the impacts have undesirable outcomes

These terms are used throughout this report to describe the nature of impacts though the most specific comment is made in respect of **direct impacts** (impacts that can be expected to result explicitly and directly as a consequence of a policy or other choices). There is also clear commentary in respect of cumulative and synergistic impacts (to some degree these terms will pick up on secondary impacts and many secondary impacts are of an in-combination nature). Most impacts are noted in this assessment to be long-term and permanent in nature.

- 1.22 This **Chapter 1: Introduction** has introduced the SA of the Cranbrook Masterplan. The remainder of the report is structured into the following chapters:
- **Chapter 2: Methodology** describes the approach that has been taken to the SA of the Masterplan.
  - **Chapter 3: Sustainability context for development at Cranbrook** summarises the relationship between the Cranbrook Masterplan and Cranbrook Plan and other relevant plans, policies and programmes; describes the social, economic and environmental characteristics of the area and identifies the key sustainability issues.
  - **Chapter 4: SA and Wider Work and Findings at the Issues and Options Stage** summarises the early stages of SA findings.
  - **Chapter 5: SA Testing in respect of masterplan evidence** summarise and tests the key themes in the evidence section of the masterplan.
  - **Chapter 6: Testing of Masterplan Design Principles** tests underlying design principles in the Masterplan.
  - **Chapter 7: Testing of Alternative Site and Land development Options** tests the suitability of land areas around Cranbrook for future development.
  - **Chapter 8: Testing Potential Future Policy for the Cranbrook Plan** tests subject matters that have been identified for potential policy in the Cranbrook Plan.
  - **Chapter 9: Monitoring** describes the approach that should be taken to monitoring the likely significant effects of the Cranbrook Plan and proposes monitoring indicators.
  - **Chapter 10: Conclusions and Next Steps** summarises the key findings from the SA and describes the next steps to be undertaken in the preparation of the Cranbrook Plan and the SA.
- 1.23 The main body of the SA report is supported by the following appendices: **Appendix 1** – provides details of the Regulation 18 consultation that formed the starting point of plan making.
- **Appendix 2** - lists the comments that were received during the Scoping consultation and describes how each one has been addressed in the SA work undertaken since then.
  - **Appendix 3** – provides an assessment of net density levels built at Cranbrook at summer 2017.

### Links to and Availability of Technical Evidence

- 1.24 In this SA work there are direct specific web links to some technical evidence and background papers. Other documents referred to can be found on the Council web site at:

<http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-preferred-approach-evidence-base>

## 2 Methodology

- 2.1 In addition to complying with legal requirements, the approach being taken to the SA of the Cranbrook Plan is based on current best practice and the guidance on SA/SEA set out in the National Planning Practice Guidance, which involves carrying out SA as an integral part of the plan-making process.

### Stages in Plan Making and SA

- 2.2 **Table 2.1** below sets out the main stages of the plan-making process and shows how these correspond to the SA process.

**Table 2.1: Corresponding stages in plan making and SA**

<b>Local Plan Step 1: Evidence Gathering and engagement</b>
SA stages and tasks
<b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b> <ul style="list-style-type: none"> <li>1: Identifying other relevant policies, plans and programmes, and sustainability objectives</li> <li>2: Collecting baseline information</li> <li>3: Identifying sustainability issues and problems</li> <li>4: Developing the SA framework</li> <li>5: Consulting on the scope of the SA</li> </ul>
<b>Local Plan Step 2: Production</b>
SA stages and tasks
<b>Stage B: Developing and refining options and assessing effects</b> <ul style="list-style-type: none"> <li>1: Testing the Plan objectives against the SA framework</li> <li>2: Developing the Plan options</li> <li>3: Evaluating the effects of the Plan</li> <li>4: Considering ways of mitigating adverse effects and maximising beneficial effects</li> <li>5: Proposing measures to monitor the significant effects of implementing the Plans</li> </ul>
<b>Stage C: Preparing the Sustainability Appraisal Report</b> <ul style="list-style-type: none"> <li>1: Preparing the SA Report</li> </ul>
<b>Stage D: Seek representations on the Plan and the Sustainability Appraisal Report</b> <ul style="list-style-type: none"> <li>1: Public participation on Plan and the SA Report</li> <li>2(i): Appraising significant changes</li> </ul>
<b>Local Plan Step 3: Examination</b>
SA stages and tasks
<ul style="list-style-type: none"> <li>2(ii): Appraising significant changes resulting from representations</li> </ul>
<b>Local Plan Step 4 &amp; 5: Adoption and Monitoring</b>
SA stages and tasks
<ul style="list-style-type: none"> <li>3: Making decisions and providing information</li> </ul>
<b>Stage E: Monitoring the significant effects of implementing the Plan</b> <ul style="list-style-type: none"> <li>1: Finalising aims and methods for monitoring</li> <li>2: Responding to adverse effects</li> </ul>

- 2.3 The methodology set out below describes the approach that has been taken to the SA of the Cranbrook Plan to date and provides information on the subsequent stages of the process. Where appropriate the SA of the Cranbrook Plan is drawing from the SA/SEA work that has been carried out over the last few years in relation to the East Devon Local Plan.

### Stage A: Scoping

- 2.4 The SA process began in September 2015 with the production of a Scoping Letter for the Cranbrook Plan. Given the narrow scope of the Cranbrook Plan, plus the fact that a detailed SA Scoping consultation had already been undertaken for the East Devon Local Plan, LUC, in agreement with East Devon District Council, prepared a consultation Scoping letter<sup>5</sup> instead of a full Scoping Report. The letter set out the scope of the SA work that would be undertaken for the Cranbrook Plan and was sent to the statutory environmental bodies (these are - Natural England, Historic England and the Environment Agency) for comment.
- 2.5 The Scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The SA Scoping letter for the Cranbrook Plan presented the outputs of the following tasks:
- Policies, plans and programmes of relevance to the Cranbrook Plan, and which shape the policy context for its development, were identified and the relationships between them were considered. This included policies from the East Devon Local Plan. This process enables any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed.
  - Baseline information was collected on environmental, social and economic issues of relevance to the Cranbrook Plan area, drawing on the information that was collated and regularly updated throughout the SA of the East Devon Local Plan. This baseline information provides the basis for predicting and monitoring the likely effects of the Cranbrook Plan and helps to identify alternative ways of dealing with any adverse effects identified.
  - Key sustainability issues for the Cranbrook area were identified, drawing from those identified in the East Devon Local Plan SA where relevant.
  - The Sustainability Appraisal framework that was used in the SA of the East Devon Local Plan was presented, comprising the SA objectives against which options and subsequently policies would be appraised. It was considered appropriate to make use of this SA framework rather than developing a new framework 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 provides a way in which the sustainability impacts of implementing a particular plan can be described, analysed and compared. It sets out a series of sustainability objectives that define long-term aspirations for Cranbrook and East Devon with regard to social, economic and environmental

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<sup>5</sup> <http://eastdevon.gov.uk/media/1321611/cranbrook-sea-scoping-letter.pdf>

considerations. During the SA, the performance of the Cranbrook Plan options (and later, policies) are assessed against these SA objectives.

- The SA Scoping letter also included details of the proposed assessment methodology for the Cranbrook Plan, drawing on the methodology used previously for the SA of the East Devon Local Plan. Details of the proposed structure of the SA Report and next steps in the SA and Plan-preparation process were also provided.

- 2.6 Public and stakeholder participation is an important element of the SA and wider plan-making processes. It helps to ensure that the SA report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development. The SA Scoping letter for the Cranbrook Plan was published in September 2015 for a five week consultation period with the statutory consultees (Natural England, the Environment Agency and Historic England) as well as other interested parties.
- 2.7 **Appendix 2** lists the comments that were received during the SA Scoping consultation and describes how each one has been addressed in the SA work undertaken since then. In light of the comments received a number of amendments have been made to the review of plans, policies and programmes, the baseline information and the key sustainability issues (see **Chapter 3**), and the SA report will continue to be updated as necessary at each stage of the process to ensure that it reflects the current situation in Cranbrook and takes account of the most recent sources of information. A number of consultation comments were also received from consultees in relation to the SA framework and those have been addressed as appropriate, as described in **Appendix 2**.

### Sustainability objectives used in the appraisal

- 2.8 Sustainability objectives are identified as overarching outcomes sought in terms of achieving sustainable forms or patterns of development. The SA objectives cover the social, environmental and economic aspects of sustainable development and for the Cranbrook Plan the objectives are the same as those used in East Devon Local Plan production.
- 2.9 **Table 2.2** overleaf presents the SA framework for the Cranbrook Plan which includes 20 headline SA objectives, as well as showing how all of the 'SEA topics' have been covered by the SA objectives. One small change has been made to the SA framework following the Scoping consultation (see response to National Trust submission) - this relates to SA objective 8 which now refers to the need to consider effects on the setting of cultural heritage assets (as described in **Appendix 2**). SA objective 19 advises - To maintain and enhance the vitality and viability of the Towns of East Devon. Cranbrook is a town and in the appraisal work consideration has focussed on whether the Masterplan approach will support the Cranbrook overall but especially the role and function of the town centre and neighbourhood centres.



Table 2.2: SA framework for the Cranbrook Plan

SA Objectives	Relevant Topic(s) covered, as set out in the SEA Regulations
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 and their settings.	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 Devon, to match levels of jobs with the economically active workforce.	Population, material assets.
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 Stage B: Developing and refining options in a plan and assessing effects

- 2.10 Developing options for a plan is an iterative process, usually involving a number of consultations with public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.
- 2.11 Regulation 12 (2) of the SEA Regulations requires that:  
 "The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of—  
 (a) implementing the plan or programme; and

(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.”

- 2.12 It should be noted that any alternatives considered to the plan need to be ‘reasonable’. This implies that alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework) or development site options that are unavailable or undeliverable.
- 2.13 It also needs to be recognised that the SA/SEA findings are not the only factors taken into account when determining which options to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to ‘rank’ them based on sustainability performance in order to select an option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting options for their plan. In the case of the Cranbrook Plan, broad conformity with the East Devon Local Plan is also appropriate, however, it should be noted that plan making regulations<sup>6</sup> clearly recognise that policies can be included in new plans that supersede those in plans that have gone before.
- 2.14 Throughout this report are references, through various stages of work, on how options have been developed and appraised and as a result refined.

### SA Stage C: Preparing the Sustainability Appraisal report

- 2.15 This SA report majors on work appraising the Cranbrook Masterplan but also describes and summarises earlier stages of work. It sets out the findings of the appraisal of options, highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects).

### SA Stage D: Consultation on the Cranbrook Masterplan and this SA report

- 2.16 East Devon District Council is inviting comments on the Cranbrook Masterplan and this SA Report. Both documents are being published (proposed for publication) on the Council’s website for consultation between 10 November 2017 and 8 January 2017.

### SA Stage E: Monitoring implementation of the Cranbrook Plan

- 2.17 Recommendations for monitoring the social, environmental and economic effects of implementing the Cranbrook Plan are presented in **Chapter 9**.

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<sup>6</sup> The Town and Country Planning (Local Planning) (England) Regulations 2012, see: [http://www.legislation.gov.uk/ukxi/2012/767/pdfs/ukxi\\_20120767\\_en.pdf](http://www.legislation.gov.uk/ukxi/2012/767/pdfs/ukxi_20120767_en.pdf) in Regulation 8, item 5, states that: “(5) Where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy.”

## Appraisal methodology

- 2.18 The reasonable alternative options for the Masterplan have been appraised against the SA objectives in the SA framework (the same framework has been used for earlier stages of SA work). Scores have been attributed to strategy and policy choices and alternative option to indicate likely sustainability effects.

### Key to symbols and colour coding used in the SA of the Cranbrook Plan

++	The option or policy is likely to have a <b>significant positive</b> effect on the SA objective(s).
++/-	The option or policy is likely to have a mixture of <b>significant positive</b> and <b>minor negative</b> effects on the SA objective(s).
+	The option or policy is likely to have a <b>positive</b> effect on the SA objective(s).
0	The option or policy is likely to have a <b>negligible</b> or no effect on the SA objective(s).
-	The option or policy is likely to have a <b>negative</b> effect on the SA objective(s).
--/+	The option or policy is likely to have a mixture of <b>significant negative</b> and <b>minor positive</b> effects on the SA objective(s).
--	The option or policy is likely to have a <b>significant negative</b> effect on the SA objective(s).
?	It is <b>uncertain</b> what effect the option or policy will have on the SA objective(s), due to a lack of data.
+/- or ++/--	The option or policy is likely to have an equal mixture of <b>both minor or both significant positive and negative</b> effects on the SA objective(s).

- 2.19 Where a potential positive or negative effect is uncertain, a question mark may be added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative score (e.g. green, yellow, orange, etc.).
- 2.20 The likely effects of the options need to be determined and their significance assessed, and this inevitably requires a series of judgments to be made. This appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is, however, often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.
- 2.21 The SA findings for the earlier stages of Cranbrook Plan work are described in **Chapter 4**.

## Difficulties encountered in the SA work

- 2.22 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process. The greatest challenge is that it is the proposals of the Masterplan that are being assessed rather than an actual draft DPD. Appraisal has progressed on the basis, to some degree, on assumptions made around the form that subsequent policies may take. In this context whilst approaches and principles behind potential development can be appraised, with assumptions made on how they will or might apply or be applied, there are unknowns and many matters of practical detail that will not be clear until later in the policy making process and thereafter planning application, development and subsequent use and management stages of the life of Cranbrook. The appraisal goes as far as is reasonably possible in assessing the work undertaken to date.
- 2.23 It should be noted that Grade 3 agricultural land comprises both Grade 3a and Grade 3b agricultural land. Only Grade 3a agricultural land, which covers about 21% of England's farmland, falls into the classification of best and most versatile agricultural land. The NPPF advises that planning authorities should seek to use areas of poorer quality land for development in preference to that of a high quality. The breakdown between Grade 3a and Grade 3b agricultural land is not available for the Cranbrook area, and therefore under the precautionary principle it is assumed that Grade 3 land has the potential to be best and most versatile agricultural land.

### 3 Sustainability Context for Development at Cranbrook

- 3.1 This chapter presents the review of relevant plans, policies and programmes and baseline information for Cranbrook, which together provide the sustainability context for the preparation of the Cranbrook Plan. At the end of the chapter the key sustainability issues for Cranbrook are identified.
- 3.2 A number of amendments have been made to the information in this chapter since it was originally presented in the September 2015 SA Scoping letter, in light of consultation comments received during the Scoping consultation and to update the information, drawing on the most recently published evidence sources.

#### Review of plans, policies and programmes

- 3.3 The Cranbrook Plan is not being prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and heritage. It must also conform to environmental protection legislation and the sustainability objectives established at the international, national and regional levels.
- 3.4 Schedule 2 of the SEA Regulations requires the SA report to include:
- (1) *“an outline of the...relationship with other relevant plans or programmes”*; and
- (5) *“the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”*
- 3.5 It is necessary to identify the relationships between the Cranbrook Plan and the relevant plans, policies and programmes so that any potential links can be built upon and any inconsistencies and constraints addressed.
- 3.6 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 for the Cranbrook Plan specifically are summarised below.
- 3.7 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the ‘SEA Directive’) and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the ‘Habitats Directive’) are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the emerging Cranbrook Plan. These processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.

- 3.8 There are a wide range of other relevant EU Directives, such as the Water Framework Directive 2000, which seeks to protect inland surface waters, transitional waters, coastal waters and groundwaters, most of which have been transposed into UK law through national-level policy, and in particular the National Planning Policy Framework (NPPF).
- 3.9 The Cranbrook Plan must be in line with national policy as set out in the NPPF and its accompanying National Planning Practice Guidance, and will also should be broadly in conformity with the adopted East Devon Local Plan. The Local Plan allocates land for development at Cranbrook through 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 shown in Strategy 12 of the 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). Proposals within the Cranbrook Plan should be in conformity with these and other strategic Local Plan policies, as well as the general development management policies in the Local Plan.
- 3.10 Since the SA of Issues and Options report was undertaken the following guidance documents, that could have relevance for the future development of Cranbrook have been produced:
- Planning Obligations Supplementary Planning Document – see <http://eastdevon.gov.uk/planning/planning-policy/planning-obligations-supplementary-planning-document-spd/>  
East Devon Gypsy and Traveller Site Design and Layout Supplementary Planning Document – see: <http://eastdevon.gov.uk/media/2016282/final-doc-gypsy-and-traveller-site-design-and-layout.pdf>
- 3.11 A number of Neighbourhood Plans are being prepared by the communities around Cranbrook and East Devon District Council is working with these communities to ensure that they develop plans for their future that build on the opportunity presented by Cranbrook. Within the vicinity of Cranbrook neighbourhood plans are currently being prepared by Rockbeare, Broadclyst, Whimble and Clyst Honiton Parish Councils and the relationship between the neighbourhood plans, the Local Plan and the Cranbrook Plan is one of the issues that may be relevant to the Cranbrook Plan. The Rockbeare Plan is at the stage of pre-submission consultation whereas the other plans have not made it to a formal draft plan status.

## Baseline information

- 3.12 Baseline information provides the context for assessing the sustainability effects 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. Schedule 2 of the SEA Regulations 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.

- 3.13 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 that SA process. Key baseline information about the Cranbrook area specifically is summarised below. 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).
- 3.14 Cranbrook is a rapidly developing new town in East Devon, close to the City of Exeter and neighbouring Whimble and Rockbeare. Development started onsite in June 2011 and the first new homes were completed in May 2012. By the spring of 2017 around 1,500 new homes had been built and occupied and future planning permissions exists, that if/when implemented, would take Cranbrook to around 3,500 new homes. Planning applications by the main consortium developing Cranbrook for the construction of 4,120 additional new homes, sports and leisure facilities and green infrastructure were also submitted to East Devon County Council in March 2015. In the summer of 2017 the consortium submitted a new major application that covered a similar land area to that featuring in one of the earlier applications. Other smaller schemes and sites at Cranbrook are either built or permitted or have been put forward by prospective developers.
- 3.15 The East Devon Local Plan proposes the expansion of Cranbrook up to 2031 to accommodate nearly 7,800 new homes. This scale of development would make Cranbrook the second biggest town in East Devon, after Exmouth.
- 3.16 On the basis of its current extent Cranbrook is located approximately 3k m to the east of Exeter at the nearest point and is approximately 1 kilometre to the north of Exeter Airport. Cranbrook is located near to the A30 trunk road and M5 motorway, and has a new railway station which has been built as part of the early stages of the town's development. During the 'rush-hour' the train into Exeter city centre takes only nine minutes compared to what can be a 40 minute or more drive by car, however, the train currently only runs hourly. In addition, there is a dedicated cycle route into Exeter from Cranbrook. However, the private car remains a key mode of transport in the area.
- 3.17 Cranbrook is being developed as a new town to include employment land, services and facilities alongside the new housing, within the context of significant growth within the 'West End' of East Devon. This means that Cranbrook will be in close proximity to the employment developments of Skypark, Science Park, a major freight facility and Exeter Airport as well as being linked to Exeter by rail, good quality cycle routes and bus services and to the surrounding countryside and the new Clyst Valley Regional Park through a network of footpaths and cycleways.
- 3.18 A new primary school, St Martin's Primary, opened in September 2012 and a new healthcare facility, Cranbrook Medical Practice, opened in spring 2015. A second primary school and the first secondary school at Cranbrook opened in September 2015 at the new Cranbrook Education Campus. A respondent to the first consultation on the Cranbrook Plan noted that Cranbrook is a very community-spirited town with lots of activities going on.
- 3.19 Cranbrook is served by a Combined Heat and Power System that is already producing heat and electricity. In the future, with a move to green fuel sources, there is the potential for this to make Cranbrook a low carbon development.

- 3.20 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 kilometres to the south east and the Exe Estuary SPA and Ramsar site is approximately 6.5 kilometres 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 through recreation and general disturbance. In partnership with Natural England, East Devon District Council and the neighbouring authorities of Exeter City Council and Teignbridge District Council have determined that housing and tourist accommodation developments in their areas will have a detrimental in-combination impact on the Exe Estuary SPA and East Devon Pebblebed Heaths SAC as a result of the impacts of recreational use. These impacts have been found to be significant from developments within 10 kilometres of these European sites, and the Cranbrook Plan area falls within this distance of both. The three Councils have prepared the South East Devon European Site Mitigation Strategy<sup>7</sup>, 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 activities away from the sensitive European sites.
- 3.21 In addition, Hellings Park Fen just north of the railway line at Wishford Farm on the Killerton estate, is a County Wildlife Site. Further away the park and woods north of Killerton House are designated as a Site of Special Scientific Interest (SSSI) for their geology. Another County Wildlife Site, Ashclyst Forest, although not designated as an SSSI, is also of national importance for its lichens and the number of veteran trees it includes. The forest also supports an important population of pearl-bordered fritillary butterfly, a greatly declined UK Biodiversity Action Plan Priority Species and is important for bats.
- 3.22 Cranbrook is located some distance from the two Areas of Outstanding Natural Beauty (AONBs) in East Devon, being approximately 4 kilometres from the East Devon AONB to the south/south east and 10 kilometres 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 Assessment<sup>8</sup>. 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 hedgerows, are distinctive, often with prominent hedgerow oaks. The landscape around Cranbrook is relatively flat but falls away steeply to the south along an escarpment bordering the airport and Rockbeare. The land rises sharply in the north east towards the green wedge east of Whimble.
- 3.23 The East Devon Local Plan Strategy 10: East Devon's West End promotes the Clyst Valley Regional Park (CVRP) as a green infrastructure initiative that will provide high quality natural green space. The CVRP land allocation surrounds Cranbrook and parts within it could potentially function as a SANG to mitigate the recreational impact of additional visitors to the European designated East Devon Pebblebed Heaths and the Exe Estuary.

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<sup>7</sup> South-east Devon European Site Mitigation Strategy. Footprint Ecology. June 2014 - <http://eastdevon.gov.uk/planning-libraries/evidence-document-library/chapter8.4-environment/env038-footprintecologysedevoneuropeansitemitigationreport.pdf>

<sup>8</sup> East Devon and Blackdown Hills Areas of Outstanding Natural Beauty and East Devon District Landscape Character Assessment and Management Guidelines (2008) - <http://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/landscape/>



- 3.24 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 East Devon Local Plan, across the northern boundary and through the centre of the area. Much of the Cranbrook development area and surrounding land is within Grade 3 agricultural land, although it is not known if this is Grade 3a or 3b. Northern parts of Cranbrook are within Grade 4 agricultural land.
- 3.25 Rockbeare Manor Registered Park and Garden is located approximately 500 metres to the south east of Cranbrook and there are a number of listed buildings within and around the development area. Approximately 5 km to the north west is the National Trust estate at Killerton (a Grade II\* listed Park and Garden), and nearby in Broadclyst village there is a designated Conservation Area. Cranbrook falls within the defined 'Zone of Potential Influence' identified in the Killerton Setting Study<sup>9</sup> which locates Cranbrook principally within a sub-area of the Lowland Plains landscape character type, character area 6c, which forms the middle to distant setting to the southern part of Killerton Park, featuring in key views from Killerton Garden. The study recognises this area to only be of low significance to the Park and currently subject to the greatest degree of change of all the areas covered by the study. However, whilst the area is of low significance to Killerton Park the potential for impacts on this heritage asset will need to be considered during the preparation of the Cranbrook Plan and through the SA.
- 3.26 There are no Air Quality Management Areas within or near to Cranbrook – the only one that has been declared in East Devon District is within Honiton, further to the east. The proximity of Exeter Airport to the south of Cranbrook means that noise is a significant concern, as well as other possible impacts associated with airport operation.

### Key sustainability issues

- 3.27 A set of key sustainability issues for Cranbrook was identified during the Scoping stage of the SA and was presented in the September 2015 Scoping letter. In light of comments received during that consultation, a small number of amendments were made to the sustainability issues at the Issues and Options stage of SA work. In this appraisal the SA options used in the Issues and Option appraisal are replicated.

### Likely evolution without the Cranbrook Plan

- 3.28 In recognition of the SEA Regulation requirement (Schedule 2) that the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme must be described in the Environmental Report, **Table 3.1** overleaf describes the likely evolution of each key sustainability issue if the Cranbrook Plan were not to be adopted.

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<sup>9</sup> LUC, (2013), *Killerton Setting Study* - [http://eastdevon.gov.uk/media/1091829/nt-killerton-setting-study-report-v2\\_final.pdf](http://eastdevon.gov.uk/media/1091829/nt-killerton-setting-study-report-v2_final.pdf)

**Table 3.1: Key Sustainability Issues for the Plan and likely evolution without it**

Key Sustainability Issue	Likely evolution of the issue without implementation of the Cranbrook Plan
The need to ensure that large-scale new development is appropriately integrated into the landscape, respecting and enhancing local character where possible.	In the absence of the Cranbrook Plan, this issue would still be addressed to some extent through relevant policies in the adopted East Devon Local Plan. The Local Plan Strategy 5: Environment states that new development will incorporate open space and high quality landscaping to provide attractive and desirable natural and built environments for new occupants and wildlife. Strategy 46: Landscape Conservation and Enhancement and AONBs requires development to be undertaken in a manner that is sympathetic to, and helps conserve and enhance the quality and local distinctiveness of, the natural and historic landscape character of East Devon. These general East Devon-wide policies will apply to all new development, including large-scale development at Cranbrook. However, if the Cranbrook Plan were not to be adopted, the opportunities to include policies relating to the landscape impacts of the town specifically would be lost; therefore this issue would not be as well addressed. Similarly, the lack of a comprehensive masterplan for Cranbrook would mean that the development is less likely to be comprehensively planned and well-integrated into the landscape.
The need to ensure that large scale new development is compatible with the wider transport network.	In the absence of the Cranbrook Plan, this issue would still be addressed to some extent through relevant policies in the adopted East Devon Local Plan. Strategy 12: Development at Cranbrook sets the overall context for the development in the Local Plan and states that the Council will produce an Infrastructure Delivery Plan that will set out key requirements recognising the need for improved transport links and road improvements as Cranbrook grows. However, if the Cranbrook Plan were not to be adopted, opportunities to consider this issue through the masterplanning process would be lost, as would opportunities to include locally specific policies relating to this issue.
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.	In the absence of the Cranbrook Plan, this issue would still be addressed to some extent through relevant policies in the adopted East Devon Local Plan. Strategy 10: Green Infrastructure in East Devon's West End refers to the potential impacts on biodiversity, including from recreation, of the large-scale growth proposed in the West End, including at Cranbrook. The policy refers to the South East Devon European Site Mitigation Strategy which has been developed to ensure that impacts on European sites specifically are avoided, and which would still be in place in the absence of the Cranbrook Plan. However, without the masterplanning process associated with the preparation of the Cranbrook Plan, opportunities to consider in more detail at the Cranbrook level the likely impacts of development at the town on biodiversity, and to address them, would be lost.

Key Sustainability Issue	Likely evolution of the issue without implementation of the Cranbrook Plan
<p>High flood risk in some parts of the development area, and the need to consider impacts on strategic watercourses.</p>	<p>In the absence of the Cranbrook Plan, this issue would still be addressed to some extent through relevant policies in the adopted East Devon Local Plan. Policy EN21: River and Coastal Flooding specifies that a sequential approach will be taken to determining the location of new development, focussing it in Flood Zone 1 where possible before Flood Zones 2 and 3. East Devon-wide policies such as this will also apply within Cranbrook. However, without the preparation of the Cranbrook Plan, opportunities to consider the issue of flooding during the detailed masterplanning process would be lost.</p>
<p>The need to conserve and enhance the setting of listed buildings and other heritage features, such as Killerton Registered Park and Garden.</p>	<p>In the absence of the Cranbrook Plan, this issue would still be addressed to some extent through relevant policies in the adopted East Devon Local Plan. Policy EN8: Significance of Heritage Assets and their Setting sets out the requirements for developers to proportionately and systematically assess the significance of any heritage assets and their settings which could be affected by development. Policy EN9: Development Affecting a Designated Heritage Asset states that the Council will not grant permission for developments involving substantial harm or total loss of significance of a designated heritage asset unless it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh that harm or loss, or that various criteria apply. These and other relevant East Devon-wide policies will apply to all development, including that at Cranbrook. However, without the preparation of the Cranbrook Plan, opportunities to consider impacts on the historic environment during the detailed masterplanning process would be lost.</p>
<p>The need to avoid high levels of car use by balancing residential development with an appropriate range of employment opportunities, services and facilities.</p>	<p>In the absence of the Cranbrook Plan, this issue would still be addressed to some extent through relevant policies in the adopted East Devon Local Plan. Strategy 12: Development at Cranbrook sets the overall context for the development in the Local Plan and states that jobs, social and community facilities will be provided alongside housing at the town. However, this policy is high level and does not include any detail about the specific location of different types of development within the town. This can be considered in more detail through the masterplanning process associated with the preparation of the Cranbrook Plan, and therefore in the absence of the Plan, the issue would not be as comprehensively addressed.</p>

## **4 SA and Wider Work and Findings at the Issues and Options Stage**

- 4.1 An SA report was produced for the Council by LUC at the Issues and Options stage of plan making<sup>10</sup> and was consulted on; summary commentary of this and other work on Cranbrook Plan making is provided below.

### **Masterplanning work undertaken prior to the Issues and Options report**

- 4.2 Prior to preparation of the Issues and Option report a series of Concept Masterplans were developed during two workshops held in July and September 2015, both of which were two days long and were led by the Savills Masterplanning team and chaired by the Design Council. During the workshops delegates heard about some of the potential issues that development at Cranbrook is trying to resolve and the possible opportunities that Cranbrook has to be a successful and sustainable new town. The workshops explored possible ways in which the design and layout of Cranbrook could capitalise on opportunities and resolve problems. Delegates explored how this information could inform the way Cranbrook expands in the future by placing squares representing hectares of different types of land use onto a scale map of the potential development area.
- 4.3 The Savills team took these designs and when reviewing them found they largely conformed to two different design ideas. The Savills team produced two composite plans as a result that formed concept masterplans. These were tested by the consultants to see which was viable, given the development context and the requirements of a sustainable settlement.
- 4.4 The masterplans were provided to LUC to be subject to SA in early 2016, and the SA findings were sent to the Council in February 2016. This work was not made publicly available at that time but was presented in the Issues and Options SA report.

### **Issues and Options report and it's Sustainability Appraisal**

- 4.5 The Issues and Options document for the Cranbrook Plan was informed by the early masterplanning work. This Issues and Options report set out an overall Vision and Strategic Objectives for the Plan and outlined the factors that could affect the development of a sustainable new town at Cranbrook.
- 4.6 An SA of the Issues and Options document was undertaken and was consulted on alongside the issues report. Succinct summary commentary of how the SA was undertaken is set out below but the SA report should be referred to for a complete picture. It should also be noted that this earlier appraisal has informed this appraisal of the Cranbrook Masterplan.
- 4.7 Although the issues report did not present specific policy options for addressing those issues, Part 4 of it did allude to some high level alternative approaches that could be taken to address some of the issues. The SA of the Issues and Options report highlighted various sustainability considerations associated with the alternatives.

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<sup>10</sup> <http://eastdevon.gov.uk/media/1762544/6596-cranbrook-sa-report.pdf>

- 4.8 The Issues and Options document provided an introductory overview of Cranbrook, in its Chapter 1, and presented background material and evidence in its chapter 2. Chapters 3 and 4 of the Issues and Options report presented a vision and objectives. The SA of the Issues and Options document appraised the vision and objectives and broadly speaking noted positive or neutral sustainability impacts when compared against the SA objectives, there were however a number of cases where uncertainty of impact was noted. It should be noted that the Cranbrook Masterplan does not have a specific vision or objectives but these may be revised or revisited in an actual future publication and submission version of the Cranbrook Plan.
- 4.9 It should be noted that the Cranbrook Masterplan does not actual have a specific vision or specific objectives, though there are lots of component parts of the plan that are about what Cranbrook may look like in the future and how it may work. On account of there not being an explicit vision or objectives in the masterplan there is not specific SA appraisal work looking at these considerations. At a future date, should the Cranbrook Plan ultimately have a vision and objectives, or something similar, it will be relevant to appraise what they say and to cross reference back to issues and options appraisals work in this respect.
- 4.10 Chapter 5 of the Issues and Option document identified a series of key issues of relevance to the future of Cranbrook and its development. These specifically were:
- a. Health and wellbeing
  - b. Culture, sport and community
  - c. Economy and enterprise
  - d. Energy and climate change
  - e. Transport
  - f. Landscape and biodiversity
  - g. Design and housing
  - h. Delivery and flexibility
- 4.11 Material relating to these issues was provided along with commentary on certain ways that issues be approached or addressed. The SA report provided a high level commentary of the potential sustainability effects of those broad approaches and identifies particular areas where there could be positive or negative effects and issues that might need to be considered if and when more detailed policies are worked up.
- 4.12 Chapter 6, Next Steps, concluded the Issues and Options report by setting out four development scenarios, these were:
- **Scenario 1.** Current density and development within areas subject to noise levels above recommended limits
  - **Scenario 2.** Current density and development in Neighbourhood Plan areas
  - **Scenario 3.** Increased average density to 45dph and development within areas subject to noise levels above recommended limits
  - **Scenario 4.** Increased average density to 45dph and some land within Neighbourhood Plan areas
- 4.13 The four scenarios were used to generate diagrammatic options of potential future development. These scenarios illustrated that maintaining current average housing density levels (35dph – as previously recorded and noted by the Council) could make it likely that development would have to

take place in areas that will either affect the visual amenity of existing settlements or in areas where future residents would be affected by noise levels above World Health Organisation recommendations. It should be noted that further work on density levels at Cranbrook has been undertaken, see **Appendix 3** to this report which indicates that existing net residential development levels currently being built at Cranbrook are around 42 dwellings per hectare. It is stressed, however, that this is a net development level and is essentially concerned with the density of development of new homes and their immediate surrounding environments. A gross density assessment has not been undertaken but it would show a lower level of houses per hectare. The SA of the Issues and Options report noted that increasing average housing density to the level suggested by Savills (45dph) reduces land-take, the likelihood of visual impact and the need to build in areas subject to high noise levels. If it is assumed the 45 dwellings per hectare reference is or should be taken as a net density figure (worked out on the same basis as highlighted in **Appendix 3**) the actual density increases proposed in the Masterplan are not great. Not with standing recent density assessment work any increase in density also increases the probable viability of businesses by putting more people within easy walking distance of such businesses and neighbourhood centres and higher density development tends to encourage greater pedestrian activity in general and therefore footfall.

- 4.14 The SA work at Issues and Options stage appraised the four scenarios and associated layouts for development. The assessment included a tabulated comparative assessment of the options at Table 4.2, this is reproduced below;

SA objective	Scenario 1	Scenario 2	Scenario 3	Scenario 4
1. Housing	-	+	-/+	+
2. Community services	-	-	+	+
3. Education and skills	0	0	0	0
4. Health	-	+/-	-/+	+
5. Crime	0	0	0	0
6. Noise	--	+	--	+
7. Leisure and recreation	-	-	+	-
8. Historic environment	-/+?	-/+?	+/-?	+/-?
9. Landscape character	+/-?	+/-?	+/-?	+/-?
10. Amenity	-	+	-	+
11. Biodiversity	-?	-?	+	+/-?
12. Sustainable transport	-	-	++/-	++/-
13. Air, soil and water	-	-	+/-	+/-
14. Greenhouse gas emissions	-	-	++/-	++/-
15. Flood risk	0	0	0	0
16. Energy efficiency	0	0	0	0
17. Waste	0	0	0	0
18. Employment	0	0	0	0
19. Vitality and viability of towns	-	-	+	+
20. Inward investment	-/+	-/+	+	+

- 4.15 The SA of the issues report includes a summary commentary of the assessment undertaken at paragraph 4.41, it advises:

*"In general, the effects of Scenario 4 on the SA objectives are broadly more positive than those of the other three scenarios. Many of the sustainability effects of the scenarios are influenced by the likely density of development, with the higher density development proposed under Scenarios 3 and 4 having generally more positive effects than the more dispersed and lower*

*density development that would result from Scenarios 1 and 2. However, the effects of Scenario 3 are less positive than Scenario 4 because it would steer development to areas of high noise levels which could adversely affect a number of the sustainability objectives.”*

4.16 The Savills Masterplanning work in 2017 formed a refinement to the Scenario 4 proposals.

4.17 Scenario 4 is described in the Issues and Options report as follows:

*“6.32 This scenario would avoid development on land that is subject to noise in excess of recommended limits.*

*6.33 It also avoids development on or near to ridgelines thereby avoiding potentially visually intrusive development, particularly when viewed from Rockbeare.*

*6.34 It would however lead to some development within Neighbourhood Plan areas potentially impacting on the separation between Rockbeare and Cranbrook. By placing development on both sides of the London Road this option means that this road would become a functioning part of Cranbrook, forming a gateway and potentially supporting the development of commercial activity and helping to support businesses in Cranbrook.*

*6.35 Higher densities would reduce the amount of land needed overall. Some may however feel that higher density is not appropriate and favour maintaining existing density levels, to do so would require more land than is shown in this scenario.*

### **Consultation feedback on the SA of the Issues and Options report**

4.18 At the time that the Cranbrook Plan Issues and Options report was consulted on the SA report of the Issues and Options plan was also consulted on. In total seven respondents made specific comment on the SA (or referred to it in their overall response). A summary of issues raised and a Council officer response is set out below. It should be noted that many respondents commenting on the Issues and Options report made reference to sustainable development issues, however, as their comments were not directly about the actual SA they are not summarised here.

4.19 The most substantive comments made on the SA were received from David Lock Associates who are acting for the East Devon New Community Partners (EDNCp) – the main consortium that are developing Cranbrook. The EDNCp have undertaken the bulk of development at Cranbrook and in the context of the SA work it is relevant to note that EDNCp have three planning applications for Cranbrook expansion that were validated in March 2015 but which have not yet (as at the Summer of 2017) been determined, plus one more with (amongst other matters) a variation on a site in one of the original submission, this was submitted in summer 2017. The applications (which if implemented would provide around 4,500 new homes) propose the expansion of Cranbrook in easterly, westerly and south-westerly directions. It should also be noted that attached as supporting commentary to the EDNCp response on the SA of the issues report was a technical document relating to noise issues produced by the consultancy firm Cole Jarmen. This technical assessment is not included or summarised in the seven responses because it is in support of the overarching EDNCp submission.

4.20 Many of the comments made by EDNCp on the SA of the Issues and Option report have a specific and direct bearing on the appropriateness and acceptability of the potential expansion of Cranbrook in a South-westerly direction. The EDNCp expansion proposal, as set out in one of their planning application, would see development, specifically including new homes, being built close to Exeter airport. East Devon District Council, as explicitly set out in the Issues and Options report,

consider it appropriate to apply World Health Organisation standards and noise thresholds in determining areas suitable for residential development. Applying such standards would render the southern parts of the south western area proposed by EDNCp as unsuitable for new housing. The EDNCp challenge the appropriateness of use World Health Organisation standards and instead advocate that other standards should be used that if applied, they contest, would **not** make the identified areas unsuitable for housing. This SA work relates and refers to noise matters though it does not go into specific and detailed technical assessment on the subject matter. East Devon District Council have taken specialist noise advice from the consultancy firm of Bickerdike Allen<sup>11</sup>.

- 4.21 This SA does not seek to rerun or address technical arguments over noise that are raised by Cole Jarman (for EDNCp) or Bickerdike Allen (for East Devon District Council). The Council assessment in this SA is premised on the work of Bickerdike Allen being sound and robust and that it should be taken forward on the basis of applying a precautionary approach to noise issues. This Council approach reflects health concerns, identified by the Council, in respect of residential living spaces and specifically outdoor spaces such as gardens and balconies that could be exposed to airport noise (indoor spaces could also be affected if otherwise noise insulated windows are opened). The Council approach also reflects the importance attached to the operation of Exeter airport and the desire attached to see a long term future for the airport. There is a very real concern that if houses are built too close to the airport then residents of those houses could object to airport noise. Such objections could result in measures to reduce flights or other operations at the airport and this could threaten its future actual existence and all or any future airport operations or expansion.
- 4.22 It should be noted that there are other areas of land at or near to Cranbrook that can be developed that would not be in disputed noise sensitive locations and this has helped inform Masterplan development. Notwithstanding these observations this SA work does consider and appraise options and alternatives for development, including residential uses, in areas that are exposed to differing noise levels.

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<sup>11</sup> See documents at: <http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-preferred-approach-evidence-base/#article-content>



**Table 4.1: Summary of consultation feedback on the SA of the Issues and Options report**

Comment by	Subject matter and summary of Comments made on the SA of the Issues and Options report	East Devon District Council - Officer Response
David Lock Associates for East Devon New Community Partners (EDNCp)	<p><b><u>South Western Expansion of Cranbrook</u></b></p> <p>At paragraph 5.15 of their submission EDNCp raise concerns that the SA has not fully and appropriately considered the wider sustainability benefits of their proposed south western expansion of Cranbrook. EDNCp specifically advise in their paragraph 5.15:</p> <p><i>“EDNCp’s concerns are that the positive opportunities for supporting and underpinning the sustainable credentials of Cranbrook as it expands are not properly acknowledged in the Issues and Options report to date and in particular in the Sustainability Appraisal that accompanies it. In this regard one issue to be addressed through the Sustainability Appraisal is a more considered assessment of positive sustainability benefits of development within the “South Western Expansion Area”.</i></p>	<p>In response to concerns raised about the need for what is presented as a more considered assessment of south-westerly expansion (as promoted by EDNCp) this appraisals work specifically assesses the overall south western expansion site that is being promoted for development by EDNCp. Site assessment in is undertaken in the context of additional further appraisal work specifically in respect of noise issues and also the location of neighbourhood facilities and their accessibility on foot and the role of London Road and development related to it.</p>
David Lock Associates for East Devon New Community Partners (EDNCp)	<p><b><u>SA Production Process</u></b></p> <p>At paragraphs 7.01 to 7.02 of their submission EDNCp raise concerns about the process and timing of SA production to support the Issues and Options report. They consider the SA is flawed and they contest it was prepared in a hurry. Concerns raised in paragraph 7.02 of the EDNCp response included:</p> <ul style="list-style-type: none"> <li>• failure to promote sustainability objectives;</li> <li>• lack of consideration of cumulative synergistic effects;</li> <li>• lack of specific consideration given to Cranbrook as opposed to the previous East Devon context (and reuse of the old approach);</li> <li>• lack of consideration of mitigation and the effects of mitigation; and</li> <li>• the simplistic evaluation of objectives on the basis of little or limited background assessments.</li> </ul>	<p>Whilst it is not accepted that the SA at Issues and Options stage was limited and flawed (it was in fact relevant and appropriate to the document that was produced) the new appraisal at masterplan stage of plan production includes much more detail. It is still considered appropriate to see Cranbrook within a wider East Devon context and for consistency and soundness reasons to use existing SA objectives for appraisal purposes. These objectives are introduced in <b>Chapter 2</b> of the SA and referred to in subsequent chapters.</p>
David Lock Associates for East	<p><b><u>Identifying Reasonable Alternatives</u></b></p> <p>At paragraphs 7.04 to 7.07 of their submission EDNCp set out a case that the SA process was not iterative and that reasonable alternatives have and were not</p>	<p>In this appraisal reasonable options and alternatives are appraised.</p>

Comment by	Subject matter and summary of Comments made on the SA of the Issues and Options report	East Devon District Council - Officer Response
Devon New Community Partners (EDNCp)	considered. They advise that reasonable and realistic alternatives have not been considered and they specifically refer to noise considerations associated with the airport.	
David Lock Associates for East Devon New Community Partners (EDNCp)	<p><b><u>Airport Noise</u></b></p> <p>At paragraph 2.31 of their submission EDNCp raise concerns that the SA has not addressed the holistic benefits of the southerly expansion of Cranbrook. This comment is made in the context of noise considerations, application by the Council of World Health Organisation standards (in general and in a blanket fashion) and the Council ruling out certain areas of land, close to the airport, as suitable for development that EDNCp consider are suitable. EDNCp specifically advise, in the first bullet point of paragraph 2.31:</p> <p><i>“EDNCp’s concerns are that:</i></p> <p>the positive opportunities for supporting and underpinning the sustainable credentials of Cranbrook as it expands are not properly acknowledged in the Issues and Options report to date and in particular in the Sustainability Appraisal that accompanies it (In this regard one issue to be addressed through the Sustainability Appraisal is a more considered assessment of positive sustainability benefits of development within the “Southern Expansion Area).”</p> <p>At paragraphs 7.08 of their submission EDNCp set out that alternative standards or thresholds to those of the World Health Organisation should have been applied in the SA work. The EDNCp continue at paragraph 7.11 of their comments by noting that the SA work does not consider alternative standards, they specifically note those of the Noise Policy Statement for England which is applied to planning practice and plan making by the Planning Practice Guidance Note. At paragraph 7.18 they specifically advise that</p>	<p>This new appraisal considers noise issues in more detail. In undertaking SA work this appraisal does not seek, however, to critically review technical noise evidence. The appraisal is produced in the context of technical matters relating to airport noise being addressed elsewhere in specific noise related assessment work.</p> <p>In simplified terms the Council critique is that developing in noisy areas is, in principle, best avoided and in broad terms the closer to the airport development is located the greater the noise levels and pollution that users and occupants of buildings experience will typically be.</p> <p>This SA report and the assessment within it is produced on an assumption, justified by specific council noise evidence (see the Bickerdike Allen report), that there are and would be adverse health and quality of life impacts that would arise should development occur within or on areas of land that fall within the 55 dB standard promoted by the World Health Organisation. This appraisal work recognises that noise issues are relevant to some sustainability concerns and that there are other sustainability considerations where noise is not of relevance. In appraising the option of development in the south west area, as promoted by EDNCp, this assessment work highlights a number of sustainability benefits that the EDNCp sites could help promote; it does this, however, in the context of noting potential for significant adverse impacts associated with noise concerns.</p>

Comment by	Subject matter and summary of Comments made on the SA of the Issues and Options report	East Devon District Council - Officer Response
	<p>“In short the guidance notes that it is only at the point where noise exposure exceeds the significant observed effect level that noise starts to result in a material change in behaviour.”</p> <p>The EDNCp submission advises that the airport noise is/would be at a ‘lowest observed adverse effect level’ and that this is a standard that should be considered in appraisal noting that consideration should be given (in SA work) to mitigation and minimising effects. At paragraph 7.20 EDNCp highlight that applying what they consider to be a more appropriate lower standard would not impinge on potential expansion areas at Cranbrook. At Paragraph 7.21 EDNCp highlight that:</p> <ul style="list-style-type: none"> <li>• World Health Organisation standards do not feature in in Planning Practice Guidance;</li> <li>• The Council are seeking to apply standards that are more onerous than those applied by the Airport in their Masterplan;</li> <li>• The Council are seeking to apply a tool that is not supported as a tool for strategic assessment by the National Physics Laboratory Report;</li> <li>• That the Council standards is meant to relate cases where there is continuous and steady noise;</li> <li>• Nosiest levels relatively infrequently occur;</li> <li>• Higher noise protection is not applicable in a new town of 8,000 dwellings.</li> </ul> <p>The EDNCp summarise at paragraph 7.23 that in their opinion the SA should consider differing baseline assumptions in respect of noise.</p>	
David Lock Associates for East Devon New	<p><b><u>Density</u></b></p> <p>At paragraphs 7.09 to 7.10 of their submission EDNCp set out that alternatives scenarios of increasing density, above that which has been achieved to date,</p>	<p>In response to representations made the issue of density levels have been revisited. <b>Appendix 3</b> to this SA report provides an assessment of net density levels built at Cranbrook at Summer 2017. This new assessment indicates that the current phases of houses at Cranbrook</p>

Comment by	Subject matter and summary of Comments made on the SA of the Issues and Options report	East Devon District Council - Officer Response
Community Partners (EDNCp)	<p>should not be seen as a realistic alternative. They highlight, in respect of Scenarios 3 and 4 in the Issues and Options document, that:</p> <ul style="list-style-type: none"> <li>• The suggested higher density levels are already being achieved;</li> <li>• Existing densities are causing parking and amenity concerns;</li> <li>• The council do not set out how density is being measured;</li> <li>• Applying higher density would undermine the successful approach adopted to date;</li> <li>• Future higher densities would push high density development to the edges of Cranbrook rather than the core.</li> </ul> <p>At paragraph 7.26 the EDNCp challenge what they see as an assumption in the SA that increasing density will mean lower levels of development into landscape sensitive areas nor, it is contested, does the SA highlight negatives associated with increasing densities. At paragraph 7.28 the EDNCp advise, in response to their reading of assumptions in the SA, that:</p> <ul style="list-style-type: none"> <li>• Increasing density would not result in a greater range of homes;</li> <li>• It would not lead to more walkable neighbourhoods – contesting that it would lead to a need for more open space;</li> <li>• Would result in lower population levels in Cranbrook expansion areas and would negatively impact on viability.</li> </ul>	<p>have been built at an average density of around 42 dwellings to the hectare – the net density is taken to comprise of houses and gardens, estate roads and footpaths and incidental open space in estates. It excludes such areas as strategic highways and access roads, major landscaping areas and parks, playing fields, schools and community and businesses uses.</p> <p>In respect of proposed density of future development the work undertaken by Savills on the Masterplan sets proposed development zones and areas. These zones specify density of development that is planned for.</p>
David Lock Associates for East Devon New Community Partners (EDNCp)	<p><b><u>Landscape</u></b></p> <p>At paragraph 7.26 the EDNCp welcomes the recognition in the SA that the landscape effects of the alternative scenarios can only be considered to be inconclusive as little or no detailed information is available.</p>	<p>The Masterplan is supported by detailed landscape assessment work. The SA work applies principles relevant to consideration of landscape issue in assessing broad approach and land options for future Cranbrook development.</p>

Comment by	Subject matter and summary of Comments made on the SA of the Issues and Options report	East Devon District Council - Officer Response
David Lock Associates for East Devon New Community Partners (EDNCp)	<p><b><u>Mitigation</u></b></p> <p>The EDNCP consider, paragraph 7.45, that little reference is made to potential mitigation of landscape or noise impacts in the SA report. They highlight that their noise consultants, Cole Jarman, set out a considerable range of measures for noise mitigation, they highlight at Paragraph 7.49 of their submission measures to include - through layout, building design, conditions, non-sensitive uses and engine testing pen.</p>	<p>It is recognised that there is some scope for mitigation of adverse noise impacts. But there are limitations to how far mitigation can go and this would be especially relevant to the noisiest areas, typically those closest to the airport and for where here is outdoor space, such as the garden areas of new homes.</p>
David Lock Associates for East Devon New Community Partners (EDNCp)	<p><b><u>Neighbourhood Plan Areas</u></b></p> <p>At paragraph 7.56 of their submission the EDNCp express concern that the SA work has not taken into account Neighbourhood Plan areas.</p>	<p>It is recognised that Neighbourhood plan areas are of some relevance in informing policy choices but potential constraints they may apply should be seen alongside other planning and evidence considerations. Where technical evidence supports and justifies neighbourhood Plan policies this will be of relevance in informing future Cranbrook Plan policy.</p>
David Lock Associates for East Devon New Community Partners (EDNCp)	<p><b><u>Green Wedges</u></b></p> <p>At paragraph 7.56 of their submission the EDNCp express concern that the SA work has not taken into account avoidance of development in Green Wedge areas.</p>	<p>It is recognised that Green Wedges are of relevance in informing policy choices but potential constraints they may apply should be seen alongside other planning and evidence considerations. Furthermore, it should be noted that Green Wedges do not place an absolute ban on development, there actual fundamental purpose is to resist settlement coalescence arising from development.</p>
David Lock Associates for East Devon New Community Partners (EDNCp)	<p><b><u>Viability</u></b></p> <p>At paragraph 7.57 of their submission the EDNCp express concern that the SA work has not taken into account viability issues and specifically securing critical mass of development to deliver infrastructure, services and facilities.</p>	<p>It is not seen as specifically relevant for the SA work to address viability matters. The Council has commission the consultancy firm of Three Dragons to assess viability considerations with detailed work to come through in 2018 ahead of actual Cranbrook Plan publication. If their work highlights particular issues or concerns this could feed back into future SA work. Notwithstanding this separate consultancy work the Cranbrook Plan proposals do create areas of massing of development and this SA comments on massing related issues.</p>

Comment by	Subject matter and summary of Comments made on the SA of the Issues and Options report	East Devon District Council - Officer Response
Natural England	<p><b><u>Scope of the Issues and Options report and therefore of the SA</u></b></p> <p>In respect of the issues document just presenting four scenarios Natural England advise:</p> <p><i>“It is however disappointing that this opportunity was not taken to examine policy, delivery or monitoring options, other than the four site specific scenarios. Our response is therefore limited and we assume that further options will follow this Issues and Options report and that they will undergo SA/SEA.”</i></p>	<p>The observations of Natural England at Issues and Options consultation are noted. At the more detailed stage of Cranbrook plan consultation a more detailed assessment will be undertaken. However, for this Masterplan appraisal the SA work is restricted to the matter the Cranbrook Plan addresses.</p>
University of Exeter – Centre for Energy and the Environment	<p><b><u>Baseline Information and low carbon development</u></b></p> <p>The Centre for Energy and the Environment question the SA reference to the Cranbrook Heat and Power System making Cranbrook a low carbon development which is considered to over-simplify matters and to date cumulative CO<sub>2</sub> emissions are greater than if each house had a condensing boiler. It is considered that <i>“Much more needs to be done to ensure that Cranbrook lives up to its true on-site zero carbon intent through the generation of sufficient on- site renewable heat and electricity.”</i></p>	<p>The points made are noted and agreed with. Cranbrook is not currently working as a low carbon development (noting the comparison with carbon levels if condensing boilers were fitted to house). Text in the baseline information chapter of this SA is amended to recognise this point. The aspirations is, however, for future per dwelling/per person carbon emission levels to be lower in the future and it will be relevant for policies in the plan and wider initiatives to explore and (probably) seek to promote this outcome.</p>
Jilling Hayes Planning for Mr A Pemberton of Higher Cobden Farm	<p><b><u>Suitability for Development of Land at Higher Cobden Farm</u></b></p> <p>Jilling Hayes Planning are promoting their clients land for development through the Cranbrook plan and consider that the SA should assess the suitability of the land.</p>	<p>This SA work has considered the suitability of this land are for allocation.</p>
Jilling Hayes Planning for Mr M Horn of Little Cobden	<p><b><u>Suitability for Development of Land at Little Cobden</u></b></p> <p>Jilling Hayes Planning are promoting their clients land for development through the Cranbrook plan and consider that the SA should assess the suitability of the land.</p>	<p>This SA work has considered the suitability of this land are for allocation.</p>

Comment by	Subject matter and summary of Comments made on the SA of the Issues and Options report	East Devon District Council - Officer Response
Trevor Preist	<p><b><u>Lack of Numerical Data in the SA</u></b></p> <p>The respondent questions the lack of numerical data in the SA report in respect of transport and the implications of further development on vehicles levels and flows. The respondent advises of the need to employ transport specialist to assess transport matters and the submission highlights potential for significant movement of people for work purposes with concerns around potential scale and use of the private car.</p>	<p>The point made about employing transport experts is noted and to inform plan preparation, and specifically the Masterplan work, the consultancy UDS have undertaken transportation assessment. The SA work has not sought to generate and assess technical transport work in its own right, rather it is based and reliant on the robustness of work undertaken to indicate the robustness of the overall Masterplan.</p>
PCL Planning for Waddeton Park Ltd	<p><b><u>Scenarios in the Issues and Options Report</u></b></p> <p>PCL Planning, for Waddeton Park, consider that Scenario 4 from the SA testing scores best and Scenario 2 is preferable to 1 and 3 (they consider that the latter two should not be taken forward).</p>	<p>The observations are noted. In this more detailed SA testing of the Cranbrook Masterplan far more detailed assessment work is undertaken that supersedes the scenarios tested at issues and Options stage.</p>
PCL Planning for Waddeton Park Ltd	<p><b><u>Housing Matters</u></b></p> <p>PCL Planning for Waddeton Park Ltd, consider that Scenario 3 should score as low as Scenario 1 as the noise issue related to this scenario is the determining factor. They also do not agree that a higher average density will lead to a greater range of housing types, sizes and appearance and is therefore a positive; this they contest can be delivered regardless of whether a higher average density figure is set or not.</p>	<p>Whilst the observations are noted it is considered that for non-noise matters the SA testing at Issues and Options consultation was correct in highlighting greater concerns with Scenario 1 compared to Scenario 3. The observations on higher densities are not agreed with as higher density development is considered to lead to/be delivered by a greater range of house types and will ensure facilities are easier to walk to.</p>
PCL Planning for Waddeton Park Ltd	<p><b><u>Community Services Objectives</u></b></p> <p>PCL Planning for Waddeton Park Ltd, do not agree that Scenarios 1 and 2 should be given a negative score. They consider walking distances is not the determining factor as has been assigned.</p>	<p>Whilst the observations are noted it is considered that higher density development will result in more people living within easy/easier walking distance of facilities in comparison to lower density development.</p>
PCL Planning for Waddeton Park Ltd	<p><b><u>Health and Wellbeing</u></b></p> <p>PCL Planning for Waddeton Park Ltd, do not agree that Scenario 3 should be given a positive. Noise issues, they contest, mean it should be given a negative and they do not agree that higher density development will automatically lead greater health and wellbeing benefits.</p>	<p>Specifically in respect of noise issues and for the potential for development near to the airport the health issue point is agreed with. This SA testing of the Cranbrook masterplan is more detailed and consider noise and land development issues and possible development sites in far more detail.</p>

Comment by	Subject matter and summary of Comments made on the SA of the Issues and Options report	East Devon District Council - Officer Response
PCL Planning for Waddeton Park Ltd	<p><b><u>Greenhouse Gas Emissions</u></b></p> <p>PCL Planning for Waddeton Park Ltd, do not agree that Scenarios 1 and 2 should be marked negatively compared to 3 and 4. Being lower density, in respect of station location, does not mean that they cannot deliver positive benefits as a shuttle bus could be provided access to the station and people can use neighbourhood centres.</p>	<p>The preference should be to allow for people to walk to the station rather than be reliant on a shuttle bus noting that there is no guarantee that it would be provided or how good the service would be.</p> <p>Furthermore if a shuttlebus were provided it might lessen the scope for spending money that would be needed for other sustainability/service benefits.</p>
PCL Planning for Waddeton Park Ltd	<p><b><u>Vitality and Viability</u></b></p> <p>PCL Planning for Waddeton Park Ltd, feel that average higher densities being a benefit for the town centre is overplayed. The viability of the town centre will be a product of the large population being served and not because of density.</p>	<p>On this point it is not agreed that low density development will have the same or equal impacts as higher density development. Higher density development in and near to the town centre, in particular, will provide a greater mass of people in and close to the town to support, use and interact with town centre facilities.</p>



## 5 SA Testing in Respect of Masterplan Evidence

- 5.1 The Cranbrook Masterplan is informed by a range of evidence reports which are referred to in sub-sections with supporting commentary in the Masterplan (see Masterplan Chapter 2). The evidence highlights favoured approaches to development and in some cases facilities that Cranbrook development should accommodate. This chapter of this appraisal considers the evidence/sub-sections of the Masterplan and considers alternatives to highlighted approaches applied in the Masterplan itself. In this context it should be noted and reiterated that the Masterplan will become key evidence behind the actual Cranbrook Plan that will be produced in 2018. To some degree this work (and the next chapter) revisit SA work originally undertaken at the Issues and Options stage of plan making, specifically chapter 4 paragraphs 4.9 to 4.29 of that work.
- 5.2 In revisiting and expanding considerably on the early Issues and Options appraisal, especially noting Masterplan progress, this stage of work has allowed for a number of comments and concerns, and therefore related considerations, raised at SA of the Issues and Options consultation, to be re-assessed in some detail.
- 5.3 The chapter predominantly provides a higher level commentary of the potential sustainability impacts of alternative broad approaches to development and in some cases identifies particular areas where there could be positive or negative impacts associated with different approaches to development. The alternative options referred to in this chapter have been identified by Planning Policy officers of East Devon District Council as reasonable alternatives to the approach highlighted in the Masterplan.
- 5.4 The start of Chapter 2 of the Masterplan highlights health and wellbeing considerations and there is an underlying theme that runs through the Masterplan of seeking to promote positive health outcomes. Whilst there are a range of aspects to promoting this objective and also policy choices about how the objective could be achieved there are not considered to be in principle realistic alternatives to seeking positive health outcomes at Cranbrook. Given that alternatives to promoting health are not seen as realistic (for example it would not be seen as a realistic choice to consider explicitly planning for a town where people will be unhealthy) the objective of promoting health and wellbeing, compared to alternatives, is not appraised. In this context it should be noted that SA objective 4 directly refers to health and other SA objectives explicitly or implicitly cover health considerations. Furthermore alternatives and options on a range of subject matters and choices developed through the masterplan and assessed in this appraisal have differing potential health impact considerations.

## Culture and Community

- 5.5 The Cranbrook Plan advises of there being a cultural development strategy for the new town<sup>12</sup>. This sets out objectives around local distinctiveness, walkable neighbourhoods and identity, it also provides community facilities, spaces and meeting/activity spaces.
- 5.6 The Cranbrook plan has been developed to confirm provision of facilities and in some case show location of such facilities.

### Alternative Options

- 5.7 The following possible policy approaches to providing (or not providing) facilities at Cranbrook are identified (see table at the end of this sub-section for appraisal of options against SA objectives):
- a) Provide the types of facilities identified in the Cultural Strategy;
  - b) Seek to provide a much greater range and quantity of facilities;
  - c) To not have cultural or community facilities (or accept very few are provided).
- 5.8 The table at the end of this section compares these options against the sustainability objectives.

### Direct impacts

- 5.9 Not surprisingly Options a) and b), which would provide for facilities, see positive direct sustainability benefits against a number of the objectives. Option c) that does not provide for facilities would have negative impacts. By providing more or a greater range of facilities (or at least seeking to provide more) option b) scores a number of double positives as opposed to single positives for Option a). The scale of the positives (and negatives) set out in the table is open to some degree of interpretation and also imprecision as (by design) the appraisal does not seek to quantify levels but rather establishes a general picture and overview.
- 5.10 The specific greatest positives associated with both options a) and b) and corresponding greatest negatives for option c) are in respect of access to community services (objective 2), leisure and recreation (objective 7) and vitality and viability (objective 19). The first two are directly about facilities and people being able to use them and the final one about places and how they work. Clearly under Option c) people would have not have easy access to facilities and to reach them, if they were able, would have to travel longer distances or out of Cranbrook (hence negatives for sustainable transport and greenhouse gas emissions (12 and 14).
- 5.11 In respect of Option b), providing the greatest number of facilities, there is the issue of cost attached and the financial viability of high levels of provision and operation. Available monies to pay for facilities (and provision of facilities compared to other services or plan objectives) will invariably be a consideration for the new town. There is, however, also a danger that we with too many facilities there could be over-supply and that they end up being under used. Leaving aside

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<sup>12</sup> See documents at: <http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-preferred-approach-evidence-base/#article-content>

financial considerations too much underuse could also have wider negative impacts including risk of vandalism and crime or under action or investment in maintenance.

**Secondary, cumulative and synergistic impacts**

- 5.12 Provision of facilities, option a) and b), could be expected to have positive secondary, cumulative and synergistic benefits as well as direct benefits. For example as a 'by product' in participating in events that places will provide for people's health can be expected to be improved and people being activity and out and about in Cranbrook can be expected to add to the overall quality of place.

**Permanence and Timescale of impacts**

- 5.13 Benefits of facility provision, options a) and b), can be expected to have a long term impact but also it is important for early provision to ensure immediate accessibility and to help establish patterns of use at the outset of provision.

**Scope for Mitigation**

- 5.14 The negatives associated with option c), not having facilities, could be challenging to mitigate against. To some degree it would require people to leave Cranbrook to access facilities but also it might simply be that there is less participation in activities and people maybe make their own entertainment in their home. In respect of vitality considerations at town and neighbourhood centres the lack of facilities could substantially reduce their overall appeal and visitor levels and this could have wider adverse impacts on the appeal of such centres for other activities and services, such as shops. It is not clear what mitigation might be possible.

Table 5.1 - SA appraisal of alternative options for culture

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)		1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a)	Provide the types of facilities identified in the Cultural Strategy	0	+	+	+	0	0	+	0	0	0	0	+	0	0	0	0	0	0	+	+
b)	Seek to provide a much greater range and quantity of facilities	0	++	+	+	0	0	++	0	0	0	0	+	0	0	0	0	0	0	++	+
c)	To not have cultural or community facilities (or accept very few are provided)	0	--	0	0	0	0	--	0	0	0	0	-	0	-	0	0	0	0	--	-

## Economic Development and Provision of land for jobs

- 5.15 There is an Economic development Strategy<sup>13</sup> for Cranbrook that looks at the factors that will build success and create a strong sense of place. It proposes that it should create a significant proportion of its own economic activity - keeping wealth in the town and providing services that the local community needs. However, given the major employment sites close by, and the competition from Exeter, it is proposed that Cranbrook concentrates on three themes:

- supporting small and growing enterprises.
- creating employment and services
- building strong links with the Growth Point

These themes provide an economic role for Cranbrook to complement the rest of the Growth Point and which offers real benefits for a growing town. Outcomes sought for Cranbrook include promoting jobs and local employment opportunities for residents. Whilst there will be a substantial number of jobs in the nearby Skypark business park, Science park and elsewhere, including Exeter City, it is also seen as desirable for the future wellbeing of Cranbrook that it should support employment. Local Plan policy and the Cranbrook Masterplan set out a requirement for 18.4 hectares of employment land at Cranbrook.

### Alternative Options

- 5.16 The following possible policy approaches to supporting jobs at Cranbrook are identified (see table at the end of this sub-section for appraisal of options against SA objectives):

- a) Distribute employment land evenly across Cranbrook – lots of small sites and plots for jobs;
- b) Concentrate employment provision in just one or two large sites;
- c) Have a mixture of distributed employment provision and some larger sites.

- 5.17 The table at the end of this section compares these options against the sustainability objectives. In respect of options b) and c) it is assumed that one of the concentrations of employment land will be in the town centre of Cranbrook. In the Masterplan itself option c) is followed with most of the provision, around 12 hectares, in the town centre, and additional larger provision in the south west of the town close to Skypark.

### Direct impacts

- 5.18 All of the options for the distribution of employment land have some identified positive benefits and some unknowns, most notably in respect of noise. Certain types of employment activities, especially where badly sited, can potentially have adverse noise (objective 6) impacts and it would not necessarily matter whether they are distributed widely or concentrated in specific locations.

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<sup>13</sup> See documents at; <http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-preferred-approach-evidence-base/#article-content>

Having a degree of distribution of employment land (options a and c) should have the attraction of offering scope for jobs close to where people live and as such this should promote objectives relating to health, transport and greenhouse gas emissions (SA objectives 4, 12 and 14). All of the options should record positive economy related outputs (SA objectives 18, 19 and 20), though the dispersed option (a) might not have a critical mass of employment uses in the town centre (relating to SA Objective 20) and therefore a neutral score for this option against this objective is recorded.

### **Secondary, cumulative and synergistic impacts relating to airport noise**

- 5.19 The secondary, cumulative and synergistic benefits associated with employment provision will be tied into many of the wider plan objectives. Whilst employment activities will not, for example, necessarily directly impact on community services what the presence of jobs in certain locations will do is increase the number of people in those locations that potentially will support service and create a demand for their existence and this will offer scope to help support them. These types of benefits could be expected in other objectives where a mass of people will have positive impacts.

### **Permanence and Timescale of impacts**

- 5.20 Positive impacts of job provision can be expected to have immediate impacts but these, more critically should be long lasting and permanent.

### **Scope for Mitigation**

- 5.21 The potential negatives (or questions marks) against job provision are most likely to arise, if they occur, where sites or schemes are poorly located or managed. Noise can be one such issue but also, and in specifically in respect of large sites, is the potential for adverse landscape impacts (SA Objective 9). Large employment sites can require levelling of substantial areas of land and where poorly located and undertaken, without for example careful planting, the works involved can have significant adverse landscape impacts. Large sites should, also, be carefully positioned to ensure that they enjoy good public transport accessibility or public transport is planned as part of the development, though this is likely to be far less of a concern for town centre development which should be well served by public transport.

Table 5.2 - SA appraisal of alternative options for economic development

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)		1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a)	Distribute employment land evenly across Cranbrook – lots of small sites and plots for jobs;	0	0	0	+	0	?	0	0	0	0	0	+	0	+	0	0	0	+	0	+
b)	Concentrate employment provision in just one or two large sites;	0	0	0	0	0	?	0	0	?	0	0	?	0	?	0	0	0	+	+	+
c)	Have a mixture of distributed employment provision and some larger sites.	0	0	0	+	0	?	0	0	?	0	0	+	0	+	0	0	0	+	+	+

## Education

- 5.22 The masterplan proposes two additional education campuses one each in the eastern and western expansion areas. Based on predicted pupil numbers it is envisaged that each of these campuses would accommodate a two form entry primary school and a special educational needs school would also be accommodated in the campus at the eastern expansion area. Land is already set aside at the existing Cranbrook Education Campus which would allow for the remaining places to be provided.
- 5.23 The excellent public transport services at Cranbrook will provide access to further education places available in Exeter and the surrounding area.

### Alternative Options

- 5.24 The following possible policy approaches to supporting education provision at Cranbrook are identified (see table at the end of this sub-section for appraisal of options against SA objectives):
- a) To provide for two new primary schools, as proposed in the Masterplan, in the extension areas to the east and west of the current extent of the town;
  - b) To locate primary education provision in a more central area of the town.
- 5.25 In respect of education provision there would, in theory, be other possible scope for provision. These could include:
- More primary schools – for example four one form entry schools – but this is understood to be contrary to Devon County Council expectation (as education Authority);
  - Do not have schools at Cranbrook – but this would not accord with school provision practice.
  - Make additional provision for a further secondary school – the first one is, however, designed around projected needs from future house building.
  - Plan for post school/further education provision – but there is no known aspirations or expectations of a further education provider- to locate at Cranbrook.

- 5.26 There are therefore limited options for Cranbrook, hence the two appraised in the table at the end of this section as the reasonable alternative compared against the sustainability objectives.

### Direct impacts

- 5.27 Broadly speaking having two new primary schools on the eastern and western sides of the town compared to one (especially noting current existing provision in the existing developed parts of Cranbrook) is identified as having a range of positive sustainability benefits against negatives, for the most part, for a single school in a central area. The identified possible exception is in respect of promotion of positive town centre vitality benefits (SA Objective 20) that a central school may offer. Any scope for such a benefit would need to be seen against the accessibility and community



benefits the primary schools would offer if located close to where people live and can access on foot in the extension areas of Cranbrook to the east and west.

Secondary, cumulative and synergistic impacts relating to education provision

- 5.28 Primary school provision in general can be seen to have secondary, cumulative and synergistic benefits associated with education provision and the role that schools can play in terms of social cohesion and to some degree offering community facilities. By having schools closer to communities and residents the scope for such benefits are enhanced.

Permanence and Timescale of impacts

- 5.29 Positive impacts of school provision will take time to be implemented but should be long lasting and permanent.

Scope for Mitigation

- 5.30 If there are not schools in close proximity to where people live it would necessity greater travel and mitigation could require extra (school specific) public transport provision, there could also be the need to seek ways to mitigate against adverse impacts that local communities and neighbourhoods may feel from not having a school and this may suggest a need for other types of community facility provision.

Table 5.3 - SA appraisal of alternative options for education

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)		1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a)	To provide for two new primary schools, as proposed in the Masterplan, in the extension areas to the east and west of the current extent of the town	0	+	+	+	0	0	+	0	0	0	0	+	0	+	0	0	0	0	0	0
b)	To locate primary education provision in a more central area of the town	0	-	-	0	0	0	-	0	0	0	0	-	0	-	0	0	0	0	+	0

## Transport and Movement

5.31 A movement strategy has been prepared for Cranbrook<sup>14</sup> that sets out a number of objectives, the masterplan advises that these include:

- Promote and improve sustainable travel (this specifically is taken to mean walking, cycling and public transport);
- Reduce traffic congestion and delays, and improve air quality on key routes into and out of Exeter City Centre, from the masterplan area, through a reduction in vehicle trip generation by encouraging a modal shift from the private car;
- Integrate new development sites with established communities to increase travel choice, based on comprehensive networks and linked facilities;
- Create the required conditions to support local employment opportunities that can be accessed by sustainable modes; and
- Improve accessibility throughout the area to encourage walking and cycling and improve health and wellbeing.

5.32 Whilst the objectives cover a range of matters they can be reduced down, in respect of sustainability appraisal, to two key considerations:

- **On-site at Cranbrook** – the role and importance of promoting sustainable transport modes; and
- **Off-site away from Cranbrook** – approaches to links to surrounding areas – specifically reduce traffic congestion and delays, and improve air quality on key routes into and out of Exeter City Centre, from the masterplan area, through a reduction in vehicle trip generation by encouraging a modal shift from the private car.

No alternative approaches are considered in respect of the considerations (noting that objectives around local employment opportunities are addressed elsewhere in this appraisal.

### Alternative Options - On-Site Transport Issues at Cranbrook

5.33 The following alternative options have been identified in respect of addressing on site transport considerations at Cranbrook and promotion of sustainable transport (see the first table at the end of this sub-section for appraisal of options against SA objectives):

- a) Promotion sustainable transport modes in Cranbrook – specifically based on a hierarchy in the order of – walking, cycling, public transport and private transport.
- b) Not specifically promoting sustainable transport and not recognising a hierarchy of modes.

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<sup>14</sup> See documents at: <http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-preferred-approach-evidence-base/#article-content>

#### Direct impacts - On-Site Transport Issues at Cranbrook

- 5.34 There are a range of positive sustainability benefits associated with option a) including in respect community services (SA Objective 2), Health (4), Leisure (7), Amenity (10) and reducing greenhouse gas emissions (14). Of greatest significance is, however, the significant positive in respect of the SA objective of promoting sustainable transport. There are no negative sustainability issues associated with this option.
- 5.35 In contrast to the positives associated with promoting sustainable transport the non-promotion of sustainable transport (including with an expectation of a reliance on the private car) scores negatives against the range of sustainability objectives that sustainable transport proposals score positively against. In respect of Employment (SA objective 18) and inward investment (20) uncertain responses are recorded. The ability to access shops by car might be a factor that could encourage more people to visit the town centre and this could have positive benefits, however and conversely, if Cranbrook is designed around easy movement of car driving then people might be tempted to drive out of Cranbrook visit shops and commercial facilities with potential for adverse impacts.

#### Secondary, cumulative and synergistic impacts - On-Site Transport Issues at Cranbrook

- 5.36 Whilst no explicit secondary, cumulative and synergistic impacts are identified the means of transport used could be expected to have possible wider impacts.

#### Permanence and Timescale of impacts - On-Site Transport Issues at Cranbrook

- 5.37 The importance attached to travel, specifically an approach based on promoting sustainable modes of transport, will impact on fundamental design aspects of Cranbrook. There can be expectation of some permanence of decisions though this will also, over time, depend on the sustainable modes remaining a realistic and desirable choice for movement.

#### Scope for Mitigation - On-Site Transport Issues at Cranbrook

- 5.38 As there are no clear negatives associated through the SA objectives in respect of promoting sustainable travel there is no explicit mitigation identified. However, it is recognised that ensuring that sustainable travel modes are attractive and well used could have cost implications.

#### Alternative Options - Off-site away from Cranbrook

- 5.39 The following alternative options have been identified in respect of addressing off-site transport considerations at Cranbrook (see the second table at the end of this sub-section for appraisal of options against SA objectives):
- a) **Off-site at Cranbrook** – Reduce car journey numbers and congestion and delays in to Exeter City Centre and encourage non-car travel modes.
  - b) **Off-site at Cranbrook** – Do nothing to reduce off site impacts and do not promote non-car modes of transport.

#### **Direct impacts - Off-site away from Cranbrook**

- 5.40 There are a wide range of positive sustainability benefits associated with seeking to reduce congestion and car reliance for travel into Exeter. Positives are identified in respect of community services (SA Objective 2), Education (3), Health (4), and reducing greenhouse gas emissions (14). Education is noted as provision of post-secondary education would be off-site from Cranbrook with many students potentially studying in Exeter. Of greatest significance is, however, the significant positive in respect of the SA objective of promoting sustainable transport. There are no negative sustainability issues associated with this option.
- 5.41 In contrast to the positives associated with seeking to reduce congestion and car reliance for travel into Exeter the do-nothing option scores corresponding negatives against the sustainability objectives. In respect of Employment (SA objective 18) and inward investment (20) uncertain scores are recorded as it is not known if or how actual road systems could cope with the extra demand.

#### **Secondary, cumulative and synergistic impacts - Off-site away from Cranbrook**

- 5.42 Whilst no explicit secondary, cumulative and synergistic impacts are identified the means of transport used could be expected to have possible wider impacts.

#### **Permanence and Timescale of impacts - Off-site away from Cranbrook**

- 5.43 Given congestion issues, at peak times, traveling into Exeter there is a permanence to sustainability considerations.

#### **Scope for Mitigation - Off-site away from Cranbrook**

- 5.44 As there are no clear negatives associated through the SA objectives in respect of congestion reduction /car reliance and for travel into Exeter there is no explicit mitigation identified. However, it is recognised that there may be cost considerations associated with measures for implementing this approach (and cost implications if not implemented).

**Table 5.4a - SA appraisal of alternative options for On-site - the role and importance of promoting sustainable transport modes**

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a) Promotion sustainable transport modes in Cranbrook – specifically based on a hierarchy in the order of – walking, cycling, public transport and private transport.	0	+	0	+	0	0	+	0	0	+	0	++	0	+	0	0	0	0	0	0
b) Not specifically promoting sustainable transport and not recognising a hierarchy of modes.	0	-	0	-	0	?	-	0	?	?	0	-	0	-	0	0	0	?	0	?

**Table 5.4b - SA appraisal of alternative options for Off-Site - links to surrounding areas**

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a) Reduce car journey numbers and congestion and delays in to Exeter City Centre and encourage non-car travel modes.	0	+	+	+	0	0	0	0	0	0	0	++	0	+	0	0	0	0	0	0
b) Do nothing to reduce off site impacts and do not promote non-car modes of transport.	0	-	-	-	0	?	0	0	?	?	0	-	0	-	0	0	0	?	0	?

## Landscape and Visual Impact

- 5.45 Cranbrook is being built on a greenfield site and sits in an attractive landscape setting. The area of Cranbrook that has an existing planning permission, and also the Local Plan allocated land, is reasonably flat though on the easterly edge the ground rises quite sharply to form a visual separation from the village of Whimble. Rockbeare village lies to the south of Cranbrook and it sits at a lower level. The different height levels of Cranbrook (as built and committed at present) and Rockbeare village is such that although the two settlements are close, around 300 metres at the nearest point, there remains a definite visually separation.

### Alternative Options

- 5.46 The following possible policy approaches are identified in respect of landscape and future development impacts (see table at the end of this sub-section for appraisal of options against SA objectives):
- a) Accommodate future development in locations that are not prominent in the landscape specifically not from the villages of Rockbeare and Whimble (the two villages closest to Cranbrook); or
  - b) Accept that development can or should occur in visually prominent locations, specifically including in respect to visual prominence to nearby villages.

- 5.47 No reasonable alternatives options are identified.

### Direct impacts

- 5.48 For most of the SA objectives the location of development, in terms of landscape considerations, has no direct bearing. Where there is relevance is in respect of SA objectives 8 – historic environment (noting historic buildings at Rockbeare and Whimble) and 10 Amenity; though most of all in respect of SA Objective 9 that deals with landscape concerns.

### Secondary, cumulative and synergistic impacts relating to airport noise

- 5.49 There are no specific secondary, cumulative and synergistic impacts noted.

### Permanence and Timescale of impacts

- 5.50 Any development in visually prominent locations can be expected to have immediate short term adverse impacts, though to some degree this may 'soften' over time, especially if new planting, specifically trees, starts to form a screen to development. However substantial tree planting might be alien and negative in its own right in what is in parts of the Cranbrook area a quite open landscape.

### Scope for Mitigation

- 5.51 The negative impacts that can arise from development can to some degree benefit from mitigation measures, albeit and as noted above mitigation (such as heavy tree planting) can be alien in character to some open countryside locations.



Table 5.5 - SA appraisal of alternative options for considering landscape considerations

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)		1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a)	Accommodate future development in locations that are not prominent in the landscape specifically not from the villages of Rockbeare and Whimble (the two villages closest to Cranbrook)	0	0	0	0	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	
b)	Accept that development can or should occur in visually prominent locations, specifically including in respect to nearby villages	0	0	0	0	0	0	0	-	- -	-	0	0	0	0	0	0	0	0	0	

## Open Space Sports Pitch Provision

- 5.52 Sports pitches and associated facilities can take up large areas of land and be expensive to maintain. However, participation in sporting activities promote health and wellbeing as well as being enjoyable in its own right.

### Alternative Options

- 5.53 Two approaches to the distribution of sports pitches were identified in the Issues and Options report and are regarded as the reasonable alternatives to look at again in more detail (see table at the end of this sub-section for appraisal of options against SA objectives):
- a) Provide sports pitches over a number of sites comprising only one or two pitches on each and located throughout the town so that they are easily accessible to everyone, although they would only be able to provide limited facilities.
  - b) Provide large sports hubs in two (or perhaps more) locations which would have the potential to provide more and better pitches and also to provide club houses, changing facilities, social venues that would support sports clubs and enable other social events to take place.
- 5.54 It should be noted that the only other alternative identified was to not provide sports facilities (or perhaps rely on facilities in other locations, such as other East Devon towns or in Exeter). The alternatives were, however, rejected on account of not being reasonable.

### Direct impacts

- 5.55 There are positive comparative SA benefits associated with both approaches, although differences are not great. **Option a)** is likely to have positive effects on the accessibility of sports facilities for the community (SA objective 2) and on levels of walking and cycling (SA objective 12) because more people would live within a short distance of a sports facility. Positive effects on health (SA objective 4) are also likely. However, each individual facility may be less high quality and the lack of associated facilities may deter some people from using them, which could have the opposite effect. The effects of **option b)** would tend to be the opposite – while facilities may be less accessible, they could be more comprehensive which may encourage people to make more use of them.
- 5.56 In respect of direct impacts there could be a case that the sustainability effects would be most positive (but perhaps only marginally so) if a mix of sports facilities can be provided – some smaller and more dispersed and some larger and more comprehensive. This, however, would need to be set against other considerations, notably the costs of sports pitch provision and whilst this is not a factor taken directly into account in the sustainability appraisal it is noted that economies of scale would be likely to make provision of a small number of big facilities a commercially more viable proposition than many smaller facilities.

### Secondary, cumulative and synergistic impacts

- 5.57 There are limited secondary impacts noted for either option though for both the community related benefits associated with sports activity, as an example, could see positive outcomes in terms of lessening appeal of crime and therefore criminal activity (Objective 5).

- 5.58 Under both options for sports pitch provision there is probably more likelihood of cumulative and synergistic relationships. For example the more people participate in sports the more use could be expected of social and community facilities (though cumulative impacts could have some negatives if there was insufficient capacity in facilities but with a growing desire to use them).

#### **Permanence and Timescale of impacts**

- 5.59 The expectation would be that facilities would be of a permanent nature and whilst it may take a while to secure delivery, and potentially a while for clubs to be formed or casual use to emerge to use facilities, the expectation would be that the largely positive impacts identified would be permanent in nature.

#### **Scope for Mitigation**

- 5.60 The possible negatives associated with sports pitch provision, and they are likely to be marginal negatives, are associated with, SA objective 6 – Noise, 9 – Landscape Character and 11 – Biodiversity. Sports pitches can be moderately noisy though careful planning at the outset should allow for a separation of pitches and any associated facilities away from immediate residential neighbours and so noise concerns can be managed. Sports pitches can, at their most intrusive, require large areas of land remodelling and if done badly this can have adverse landscape impacts. Again early and careful planning and site selection offers scope to mitigate potential for adverse impacts, though this may be more challenging with the option for larger scales developments rather than an approach of greater pitch dispersal. Adverse biodiversity impacts may also arise given that sports pitches are typically heavily manicured spaces of limited biodiversity value, but they can offer scope for planting at their edges.

**Table 5.6 - SA appraisal of alternative options for sports pitch provision**

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)		1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a)	Provide sports pitches over a number of sites comprising only one or two pitches on each and located throughout the town	0	+	0	+	0	-	++	0	-	0	-	+	0	0	0	0	0	0	0	0
b)	Provide large sports hubs in two (or perhaps more) locations which would have the potential to provide more and better pitches and also to provide	0	++	+	+	0	-	++	0	-	0	-	0	0	0	0	0	0	0	0	0

## Suitable Alternative Natural Greenspace

- 5.61 Suitable Alternative Natural Green Space (SANGs) are areas that will be attractive recreation areas for residents, notably dog walkers and other uses/users that can have adverse impacts, to use instead of visiting the most significant wildlife sites - Special Protection Areas (SPA). The Council have an agreed mitigation strategy to provide SANGs in the vicinity of Cranbrook and the Cranbrook Plan identifies a number of land areas that could contribute to fulfilling this role.

### Alternative Options

- 5.62 The following possible policy approaches are identified in respect of SANGs (see table at the end of this sub-section for appraisal of options against SA objectives):
- a) Provide SANGs in and immediately next to Cranbrook.
  - b) Provide SANGs in the general vicinity of Cranbrook but not necessarily an easy walking distance.
- 5.63 The Masterplan takes the approach outlined in Option a) whereas the alternative option b) would see SANGs provision on land that could be some distance from Cranbrook and might, for example, require a car drive to access it. No other reasonable alternatives options are identified.

### Direct impacts

- 5.64 SANGs provision at or close to Cranbrook, Option a), scores significant positive benefits in respect of two SA objectives, 4 – Health and 7 – Leisure and Recreation. SANGs will provide spaces for people and dogs to get out and exercise in open areas. However SANGs close to the airport could suffer from adverse noise pollution (albeit watching airport activity could be attractive to some people). Uncertainty also applies to SA Objective 11 as whilst being SANGs could provide some scope for land to be subject to biodiversity improvements it will also be land that has a greater intensity of human and dog activity which could have adverse impacts.
- 5.65 For option b) there is potentially an element of an unknown as it is not specified where they may be, but on assumption that they could be some distance from Cranbrook and for this reason and hence less well used, two SA objectives, 4 – Health and 7 – Leisure and Recreation are (only) given positive impact scores. The potential for some or a greater degree of car use to access these sites generates negative scores against SA Objectives for Sustainable Transport (12) and greenhouse gas emissions (14).

### Secondary, cumulative and synergistic impacts relating to airport noise

- 5.66 SANGs provision, whether at Cranbrook or further away, could be expected to have wider 'knock-on' positive sustainability impacts, though more so where the SANGs are most widely used and accessible.

### Permanence and Timescale of impacts

- 5.67 SANGs should be seen as permanent in nature and the aspiration would be for early deliver to encourage and support an early pattern of use by residents of Cranbrook; rather than an absence of designated spaces causing patterns of travel to further away places, notably designated wildlife sites, for recreation activity.

### **Scope for Mitigation**

- 5.68 Possible uncertainties (and potential for negatives) in respect of SANGs provision close to Cranbrook could include looking at alternatives to provision close to the airport where noise issues might arise, or ensuring that a variety of other (quiet) areas are also provided. In respect of possible adverse biodiversity impacts measures to protect and enhance habitats and features and manage recreational uses could be desirable and appropriate.

**Table 5.7 - SA appraisal of SANGS**

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)		1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a)	Provide SANGs in and immediately next to Cranbrook.	0	0	0	++	0	?	++	0	0	0	?	0	0	0	0	0	0	0	0	0
b)	Provide SANGs in the general vicinity of Cranbrook but not necessarily an easy walking distance.	0	0	0	+	0	0	+	0	0	0	?	-	0	-	0	0	0	0	0	0

## **Sustainable Urban Drainage**

- 5.69 Sustainable Urban Drainage (SUDS) are natural parts of the landscape that have the ability to store surface water such as ponds, swales and filter strips. SUDs are typically used as an alternative to more conventional ways of managing floodwater such as rapidly piping it away.

### **Alternative Options**

- 5.70 The following possible policy approaches are identified in respect of use of SUDS (see table at the end of this sub-section for appraisal of options against SA objectives):
- a) Incorporate SUDs into Cranbrook.
  - b) To not use SUDs and rely on conventional hard engineering solutions.
- 5.71 No other reasonable alternatives options are identified.

### **Direct impacts**

- 5.72 The use of SUDs, option a), scores positively against a range of Sustainability Objectives, specifically Landscape (9), Biodiversity (11), Air, soil and water (13) and flood risk (15). As a technical response to flooding concerns, option b), also scores positively against the flood risk objective.
- 5.73 SUDs schemes can be quite land intensive and if or where not used they could potentially offer scope for land to be used for other purposes including more development. On this basis some of the land using uses under Option b) could potentially score a positive, though in the table such potential is not identified and negligible impacts are recorded.

### **Secondary, cumulative and synergistic impacts relating to drainage**

- 5.74 There are no specific Secondary, cumulative and synergistic impacts identified.

### **Permanence and Timescale of impacts**

- 5.75 Once developed any SUDs provision can and should be regarded as permanent in nature and positive benefits can be expected to occur when implemented (or even exist before).

### **Scope for Mitigation**

- 5.76 Whilst there are costs associated with establishing and maintaining SUDs there are no specific mitigation considerations identified that are directly relevant to their provision.



**Table 6.8 - SA appraisal of SUDS**

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)		1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a)	Incorporate SUDs into Cranbrook	0	0	0	0	0	0	0	0	+	0	+	0	+	0	+	0	0	0	0	0
b)	To not use SUDs and rely on conventional hard engineering solutions	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0

## Overhead Power Lines

- 5.77 The eastern expansion area and land to the south of it have two overhead power lines that cut across the site. Both lines are held on steel lattice towers which are quite visually prominent and the land beneath and 15 metres either side of them cannot be developed whilst they remain in place. The Cranbrook Plan proposes partial undergrounding of one of the lines. This frees up over 3 hectares of land for development that would not otherwise be available and should result in a better and more compact form of development and reduce pressure for development in landscape sensitive areas.

### Alternative Options

- 5.78 The following possible policy approaches are identified in respect of SANGS (see table at the end of this sub-section for appraisal of options against SA objectives):
- a) To partially underground one of the cables.
  - b) To not underground the cable.
- 5.79 No other reasonable alternatives options are identified.

### Direct impacts

- 5.80 The undergrounding of the length of cable is identified as having positive impacts against the following SA Objectives – Housing (1), Landscape character (9) and amenity (10). To not do so scores negative impacts.

### Secondary, cumulative and synergistic impacts relating to undergrounding overhead power lines

- 5.81 There are no secondary, cumulative and synergistic impacts identified.

### Permanence and Timescale of impacts

- 5.82 The impacts identified are seen as permanent in nature. Retrospective undergrounding of cables, after development occurs, is seen as an improbable outcome.

### Scope for Mitigation

- 5.83 The negative impacts associated with not undergrounding the cable would present some challenges to address though through careful design some mitigation of adverse impacts could occur.

**Table 5.9 - SA appraisal of Overhead power Lines**

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)		1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a)	To partially underground one of the cables.	+	0	0	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0
b)	To not underground the cable.	-	0	0	0	0	0	0	0	-	-	0	0	0	0	0	0	0	0	0	0

## Gypsy and travellers

- 5.84 Gypsies and Travellers are defined as "*persons of nomadic habit of life, whatever their race or origin*". There is a history of gypsies and travellers using the London Road as a route through the general area and stopping in the area and nearby locations now occupied by Cranbrook. There have also been temporary encampments in the town in recent years. This highlights the need for provision in the area which is also established by the Devon Partnership Gypsy and Traveller Accommodation Assessment (GTAA)<sup>15</sup> 2014. In response to this assessment the Local Plan identifies Cranbrook as a location for up to 30 pitches and a gypsy and traveller site design guide has also been produced and adopted as a supplementary planning document (SPD).
- 5.85 The most recent assessment of gypsy and traveller needs across the whole of East Devon shows there is a need for 16 pitches in the shorter term, up to 2019, and 12 in the longer term, after this date. This gives a total current need of 28. In a local context gypsy sites can vary in scale from one or two pitches (typically a family will occupy a pitch with a couple of caravans and other vehicles) up to 15 or so pitches.
- 5.86 The masterplan identifies two sites for the provision of gypsy and traveller pitches. These are to be located on the edges of the town where access to services and facilities as well as the wider road network are available. It is anticipated that the sites will accommodate a mixture of permanent and transit pitches but that the total number of pitches will be less than that envisaged by the Local Plan.

### Alternative Options

- 5.87 In terms of the location gypsy sites a Cranbrook there are a range of possible options as identified below (see table at the end of this sub-section for appraisal of options against SA objectives):
- a) A single large site;
  - b) A small number (say two) medium sized sites;
  - c) A large number of very small sites.
- 5.88 In the context of the above, and at this stage, assessment has not extended to quantify the actual number of pitches, in total, that should be provided for a Cranbrook.

### Direct impacts

- 5.89 The provision of pitches in any location would have positive effects on housing (SA objective 1), especially if enough are developed to meet the identified need of gypsies and travellers. The location of the sites within Cranbrook will influence the effects on many of the SA objectives as this will determine how accessible sites are to schools, community facilities, jobs and sustainable transport links. Effects on many of the SA objectives will be more positive where pitches are well-connected and levels of car use can be lower. Larger sites may be more visible and therefore more likely to affect landscape character (SA objective 9) and the setting of heritage assets (SA objective

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<sup>15</sup> See: <http://eastdevon.gov.uk/media/1298707/devon-partnership-2015-gtaa-final-report.pdf>

8); however fewer sites may be provided overall if they are larger in size which could reduce the likelihood of impacts on those SA objectives. Conversely, smaller sites may be less visible but there would be more sites overall; therefore increasing the likelihood of heritage assets and the landscape being affected, although these impacts could be mitigated through good design of sites. There can be concerns (real or perceived) of crime (SA objective 5) associated with gypsy site provision and it is possible that on a larger site the concerns might be disproportionately greater

Secondary, cumulative and synergistic impacts

- 5.90 There are no significant secondary, cumulative or synergistic impacts noted.

Permanence and Timescale of impacts

- 5.91 Effects could occur in the short to medium term as once the sites are provided there would be minimal construction time needed.

Scope for Mitigation

- 5.92 Potential for adverse impacts, specifically on a larger site, is most readily related to potential for landscape impacts. Mitigation through well thought out site design should overcome adverse impacts. This consideration does apply to smaller sites to some degree as well.

Table 5.10 - SA appraisal of alternative options for gypsy and traveller site provision at Cranbrook

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)		1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a)	A single large site;	++	0	+	+	-	-	0	0	-	0	0	0	0	0	0	0	0	0	0	0
b)	A small number (say two) medium sized sites;	++	0	+	+	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0
c)	A large number of very small sites.	++	0	+	+	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0

## Noise

- 5.93 Airport noise, and the potential for adverse health impacts that noise can have, is seen as a factor of critical importance for the future development of Cranbrook. Furthermore, beyond being an actual health issue and a causal poor health determining factor, noise can also be a nuisance and disagreeable. The Civil Aviation Authority issued a report in 2016 - Aircraft noise and health effects: Recent findings - CAP 1278<sup>16</sup> that highlighted health impacts from aircraft noise and East Devon District Council commissioned the advice from Bickerdike Allen on noise emissions from Exeter airport. This report was specifically commissioned to inform determination of the planning application submitted by EDNCp but it does have explicit relevance to Cranbrook Plan policy in respect of noise issues and particularly for the allocation of land for development.
- 5.94 The Issues and Options report, at various points and notably including paragraphs 5.a.25-28, highlighted the relevance of noise considerations. In response to comments received on noise matters on the SA of the Issues and Options report the matter of noise is readdressed in more detail in this assessment. The most critical issue in respect of noise is whether development, especially new housing, should be allowed close to Exeter airport noting noise levels generated by and from the airport.

### Alternative Options

- 5.95 The following possible approaches in respect of airport noise considerations were assessed (see table at the end of this sub-section for appraisal of options against SA objectives):
- a) Build in areas that are compliant with standards promoted by EDNCp as they advise are set out in the Noise Policy Statement for England;
  - b) Build up to but not beyond areas that are compliant with World Health Organisation noise limits – 55 dB;
  - c) Build in areas that are less noisy than the above.
- 5.96 It was not considered that there were any reasonable alternatives to the above.
- 5.97 In simple terms **option a)** above would allow for development, specifically new houses, closest to the airport (up to/close to the operational boundary of the airport) and in areas that receive the greatest noise levels. This is the option being promoted by the EDNCp and would see, according to their planning application submitted for the south west expansion of Cranbrook, new housing being built (at the closest point) around 500 metres from the main airport runway. This option would result in houses being built in areas that exceed a 55 dB noise level.
- 5.98 **Option b)** would draw housing development away, to the north of the airport, and at its closest around 750 metres from the runway and beyond a 55 dB line.
- 5.99 A more rigorous (less noisy) standard, **option c)** would see new housing even further away, to the north, of the airport. For this SA work a possible decibel boundary is not defined but if this

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<sup>16</sup> <https://publicapps.caa.co.uk/docs/33/CAP%201278%20MAR16.pdf>

restrictive approach were applied it could, for example, place significant if not total limits on westerly Cranbrook development to the south of London Road.

- 5.100 As set out earlier in this report (See Chapter 4) the SA work is premised on assessment that development (specifically including housing development) in areas that exceed World Health Organisation 55 dB levels is inappropriate. This perspective directly informs commentary and assessment reported below.

#### **Direct impacts relating to airport noise**

- 5.101 Taking the noise issues in isolation each alternative option appraised records the same conclusions for most SA objectives; most of the SA objectives are not explicitly influenced by noise. However, **Option a)** for SA objectives 1, 3, 4 and 6 (all of which in SEA regulation terms relate to population and health) record the greatest negative impacts. For these four SA objectives the double negative -- of *“The option or policy is likely to have a significant negative effect on the SA objective(s)”* are recorded. This conclusion is based on the wider council evidence and interpretation relating to noise impacts. In respect of SA objective 3 the concern would be specifically relevant should any outdoor school spaces (e.g. playgrounds or outdoor classrooms) be in the noisy areas.
- 5.102 **Option b)** scores lower than a) but still has single negative impacts *“The option or policy is likely to have a negative effect on the SA objective(s)”* for SA objectives 1, 3, 4 and 6. These impacts are, however, seen to be more related to nuisance considerations (the noise is somewhat disagreeable) rather than actual adverse health impacts.
- 5.103 **Option c)**, by avoiding the noisiest areas clearly has the least potential identified adverse impacts.

#### **Secondary, cumulative and synergistic impacts relating to airport noise**

- 5.104 In respect of the issue of aircraft noise the direct impacts noted are of most significance, especially if development occurs in the noisiest of locations, there could however be expected to potentially be some secondary adverse impacts. For example if there are sectors of the community that suffer from noise related health problems (direct impacts on SA Objective 4) this could impact on their ability to work effectively and therefore contribute to employment objectives (for example SA Objective 18).
- 5.105 Probably of more relevance than secondary impacts are the possible cumulative impacts that could arise such as from people living in noisy environments, potentially under-utilising some outdoor spaces, because they are in locations that are noisy and would not offer peace and quiet for contemplative forms of recreation. Such combinations as this could cumulatively be of increasing significance.

#### **Permanence and timescale of impacts**

- 5.106 Noise impacts can be expected to be permanent in nature, assuming the airport continues to exist and operate. Whilst some less noisy planes may operate in the future the airport could accommodate more noisy ones as well and in general might be expected to carry more traffic in the future. Applying a precautionary approach suggests that is prudent to see airport noise issues as a permanent concern.



## Scope for mitigation

- 5.107 There are measures that can be taken, to some degree, for mitigating against noise impacts for example there have been suggestions for a noise pen to be built around the site used for aircraft engine testing. Such provision, if built, could significantly reduce areas that are subject to noise pollution and reduce the scale of that pollution; though noise pollution levels elsewhere could increase (the pen may 'bounce' noise into other areas).
- 5.108 There are also mitigation measures that can be implemented through careful choice of precise building locations, building orientation, careful location of outdoors spaces and gardens. Noise insulation can be used and such measures as putting less sensitive development (such as employment buildings) closer to the airport and potentially using these as noise barriers to 'protect' other areas. Whilst all of these measures might offer some help and benefits there is a lack of evidence to show that they could have significant beneficial impacts (perhaps at best they could extend, to some degree, the total area of land that could be suitable for development).

**Table 5.11 - SA appraisal of alternative options for considering airport noise**

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)		1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a)	Build in areas that are compliant with standards promoted by EDNCp as they advise are set out in the Noise Policy Statement for England;	--	0	--	--	0	--	-	0	0	0	0	0	0	0	0	0	0	0	0	
b)	Build up to but not beyond areas that are compliant with World Health Organisation noise ‘limits’ – 55 dB;	-	0	-	-	0	-	-	0	0	0	0	0	0	0	0	0	0	0	0	
c)	Build in areas that are less noisy than the above.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

## Airport Safeguarding

5.109 The final section of chapter 2 of the Masterplan is in respect of noise and advises:

*“Tall buildings can have an impact on the airports navigation systems distorting radar signals. Advice from the airport operators tells us that these systems while currently effective were not designed to take account of the levels of development now proposed around the airport..... The masterplan proposes development within the area that affects the aircraft navigation systems, however developers will be required to contribute to the cost of a new system and further assessment work before any development over two storey's is allowed.”*

5.110 It is not considered that there are alternatives to not secure a new navigation system and absence of alternatives has meant that SA testing around this issues has not been undertaken.

## Spatial and other conclusions from testing underlying principles

5.111 This stage of appraisal has identified a number of favoured options and approaches to the spatial distribution of further development at Cranbrook. Key locational matters, noting assessment in this chapter of the SA and the Savills overall masterplanning work, has helped build up a spatial pattern for development.

5.112 In building up a spatial picture of future Cranbrook development it is important to note that a large part of Cranbrook has already been built and planning permission exists to extend Cranbrook in an easterly direction. In addition there is land allocated in the Local plan for the further eastward and westward expansion of Cranbrook. Whilst scope exist through the Cranbrook Plan to determine what should go where within these allocations (and to a minor degree potentially tweak boundaries) these areas are taken as a starting point for considering further outward expansion of Cranbrook.

5.113 Airport noise, landscape considerations and floodplains have been identified as critical considerations in determining the extent of land that might have scope for accommodating further development. Areas with landscape and airport noise considerations that are seen as at or close to being absolute constraint on development. The option of building on the floodplain has not been tested through this SA work as it is taken as an absolute constraint in its own right.

5.114 In terms of building north of the Exeter Waterloo railway line, specifically for anything that is of a strategic or large scale, this is seen as a theoretically possible option but has not been considered in detail in this SA work on account of:

- a) There are significant floodplain constraints (especially on the western side);
- b) There are large tracts of land that are in National Trust ownership and which has an inalienable status;
- c) Any new vehicular crossing of the railway, which strategic or large scale development would require, would be extremely expensive (if not prohibitively so).

- d) Land of a strategic scale has not been promoted for development by landowners or other (though one smaller scale area at Lodge Trading Estate on the road to Broadclyst Village has been promoted for development and is assessed in the next chapter of this report).

5.115 Taking these containing factors into account and working on the basis that it is not appropriate to revisit and undertake additional SA work on:

- the already built parts of Cranbrook;
- Land that has planning permission for development;
- Land that is allocated in the local plan (though see detailed commentary in the next chapter of this SA report on site specifics);

It leaves two larger scale potential areas of search for future Cranbrook expansion, one to the south east and one to the south west.

#### South Westerly Expansion Option

5.116 This SA work informs the potential suitability for strategic development in a south westerly direction at Cranbrook. There are, however, limits to how far southwards or westward development should be accommodated, as defined by airport noise and landscape considerations. It should be noted that Cranbrook land allocations lie to the north of this area and Skypark is to the west.

#### South East Expansion Option

5.117 To the south east of Cranbrook, south of London Road, the constraints to development are less pronounced. There is not the aircraft noise to contend with and land is flatter in profile, specifically other than where it is closer to the village of Rockbeare and there is visual connectivity between the village and potential development land. Whilst there are, measured against noise and landscape consideration, fewer constraints on development in this south east search area it is the case that the further south and east any development were to go the further away and hence more remotely located it would be from the core facilities, including the town centre, of Cranbrook.

5.118 The next two chapters expand on the above assessment work and consider in more detail:

- a) Masterplan design principles; and
- b) Actual specific development site options.

## **6 SA Testing of Masterplan Design Principles**

- 6.1 This chapter of the SA considers design principle, as set out in chapter 3 of the Cranbrook masterplan. The Cranbrook Plan establishes seven principle that have been informed by the key evidence (see preceding chapter of this appraisal and chapter 2 of the actual Cranbrook Plan). The design principles are similar in nature to plan objectives, though as it is a Masterplan that they inform they are very much orientated towards and around the spatial location of development rather than the broader range of considerations that may feature in a more comprehensive planning policy document.
- 6.2 Under each design principle there are a series of bullet points that set out how the principle has been translated into spatially relevant considerations, or to put it more simply what, in broad terms, goes where on the Masterplan.
- 6.3 The bullet point considerations are compared against the SA objectives in the table below along with a supporting commentary. At this stage of appraisal work the design principles have not be compared against alternative options; in broad terms, given the evidence behind the Masterplan (and noting that alternatives have already been tested against these in the SA) it is not seen that significant realistic alternatives exist. However some qualifying commentary in respect of possible alternatives, to help with context setting, is provided.

## Principle 1: Compact urban form

- 6.4 Broadly speaking the principle of securing a compact urban form can be seen to have negligible or some positive sustainability impacts where assessed against the sustainability objectives. Objectives relating to provision and accessibility to community services (notable objectives 2 and 7) and those relating to encouraging walking and cycling and reducing greenhouse gas emissions (objectives 12 and 14) score positively, as does health (objective 4). Under the first of the bullet points there is a question mark against SA Objective 9 as there is some uncertainty identified in respect of potential adverse impacts. Compact forms of development, if implemented badly, could result in tree and vegetation loss, possible other adverse impacts and ‘cramming’ development into limited spaces.
- 6.5 Whilst these adverse impacts are clearly not bound to occur it does point to the need for careful and sensitive planning to ensure that appropriate design and schemes come forward and that scope for mitigation, where adverse impacts might otherwise arise, is planned in at an early stage. In respect of noise issues it is noted that reference is made to a dedicated engine testing pen at the airport, this is seen as being positive, however with the bullet point referring to “maximise developable areas on key routes” it could be that this would direct development to locations close to busy roads. If development types such as housing or schools are located close to roads they could introduce people to adverse noise impacts, hence the uncertainty against SA objective 6. Care over the siting of development will be appropriate for noise sensitive uses.
- 6.6 Whilst formal testing of a non-compact urban form (i.e. more dispersed development) has not been undertaken it could offer potential comparative positive benefits around SA Objective 10, Amenity, by providing bigger homes and gardens for people to live in and biodiversity benefits by creating more space for nature in gardens (Objective 11). In contrast, however, negatives could be expected against sustainable transport and greenhouse gas objectives as people could be expected to be more car reliant (Objectives 12 and 14) and negative amenity impacts may arise, objective 10 as people may find it more difficult to access facilities.

**Table 6.1 - Objectives relating to - Principle 1: Compact urban form**

SA Objectives are on the top row – bullet points that come under the Principle in the masterplan are listed below	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
<ul style="list-style-type: none"> <li>The masterplan shall establish a compact urban form where all residential neighbourhoods are within walking distance of attractive open spaces, community spaces and amenities.</li> </ul>	0	++	0	+	0	0	+	0	?	0	0	++	0	+	0	0	0	0	0	0
<ul style="list-style-type: none"> <li>The masterplan shall maximise developable areas on key routes, nodes and gateways: mitigate ground testing noise through the introduction of a dedicated engine testing pen to facilitate active frontages on London Road; and underground the 132kV power line to maximise densities in an otherwise relatively unconstrained part of the site.</li> </ul>	0	+	0	0	0	?	+	0	0	0	0	+	0	+	0	0	0	0	0	0

## **Principle 2: Higher density housing and amenities close to the key movement corridors**

- 6.7 The bullet points under Principle 2, for the most part, are identified as generating either positive or neutral impacts against the Sustainability Objectives. Land is allocated for the eastward and westward expansion of Cranbrook in the Local Plan and so in principle decisions about future growth in these general directions is already determined by policy. By locating neighbourhood centres to both the east and west of Cranbrook (as it currently exist) will ensure that most residents of the town should have good or reasonable access, specifically pedestrian access, to the facilities that neighbourhood centres will offer.
- 6.8 By having higher density housing development closer to the centres it should reinforce the positive benefits of more people being in closer proximity to the centres. Significant positive benefits are identified against SA objectives 18 and 20 in respect of promoting employment growth and having provision at neighbourhood centres. Where question marks are identified in respect of uncertain impacts they highlight the possibility for adverse impacts depending on design and implemented schemes. Adverse noise impacts, Objective 6, could arise if neighbourhood centres generate a lot of activity that is too close to noise sensitive uses and similar potential for adverse impacts could apply in respect of SA objective 9, 10 and 11 – landscape, amenity and biodiversity.
- 6.9 In respect of the final bullet point with the average densities at a medium level overall and higher close to neighbourhood centres there could be adverse impacts from the mass and scale of development unless carefully planned for.



**Table 6.2 - Objectives relating to - Principle 2: Higher density housing and amenities close to the key movement corridors**

SA Objectives are on the top row – bullet points that come under the Principle in the masterplan are listed below	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
<ul style="list-style-type: none"> <li>The masterplan shall locate neighbourhood centres to the east and west of Cranbrook on the main London Road. Higher density mixed use development, active frontages and integrated pedestrian crossings shall be used to change the character of the road to an active space forming a legible gateway to the town.</li> </ul>	0	+	0	+	0	0	+	0	0	0	0	+	0	+	0	0	0	0	+	+
<ul style="list-style-type: none"> <li>Mixed-use employment and un-prescribed uses including shared community uses shall be centred around neighbourhood centres.</li> </ul>	0	+	0	0	0	?	0	0	0	?	0	+	0	+	0	0	0	++	+	++
<ul style="list-style-type: none"> <li>Average densities across the site shall be around 40dph with higher densities focused around neighbourhood centres and mixed use areas</li> </ul>	+	0	0	0	0	?	+	0	?	0	?	+	0	0	0	0	0	0	0	0

### **Principle 3: Strong links between Cranbrook, Cranbrook station and employment areas**

- 6.10 Principle 3 relates to links between Cranbrook and close by strategic employment areas. The bullet points score highly when measured against employment and economic growth objectives, notably SA objective 18. Against other SA objectives impacts are identified as neutral though uncertain question marks appear against objective 10 relating to amenity. Employment uses, at their most intrusive, can cause some disruption to other neighbouring uses, though ‘bad-neighbour’ employment activities are far less prevalent than might have been the case in years gone by and also with careful planning and development spaces can be developed to avoid adverse impacts.

**Table 6.3 - Objectives relating to - Principle 3: Strong links between Cranbrook, Cranbrook station and employment areas**

SA Objectives are on the top row – bullet points that come under the Principle in the masterplan are listed below	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
<ul style="list-style-type: none"> <li>The masterplan shall locate employment between mixed-use areas and the Skypark to provide 'stepping stone' space for B class employment, community studios and workshops.</li> </ul>	0	0	0	0	0	0	0	0	0	?	0	0	0	0	0	0	0	++	+	+
<ul style="list-style-type: none"> <li>A direct route through Bluehayes shall link Cranbrook Station and the Skypark via higher density residential zones, mixed use areas, the neighbourhood centre and employment.</li> </ul>	0	0	0	0	0	0	0	0	0	?	0	0	0	0	0	0	0	++	+	+

#### **Principle 4: The identity of Cranbrook shall be informed by landscape features and character**

- 6.11 Principle 4 is explicitly concerned with how landscape consideration and constraints have informed the Cranbrook Masterplan. Significant positive effects are identified against the three bullet points in respect of SA Objective 9, Landscape Character. The third bullet point which sets out a general approach to landscape *“Established landscape features shall be retained and integrated within parks, green corridors and informal open space”* also scores positively SA Objective 7 – leisure and recreation and 11, biodiversity. It might also have been reasonable to show wider direct impacts on other SA objectives, such as health, SA Objective 4. Whilst these have been recorded as negligible in direct terms the implementation of the objective could be expected to have indirect positive effects in respect of the objective.

**Table 6.4 - Objectives relating to - Principle 4: The identity of Cranbrook shall be informed by landscape features and character**

SA Objectives are on the top row – bullet points that come under the Principle in the masterplan are listed below	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
<ul style="list-style-type: none"> <li>Cobdens and Grange shall be focused around a neighbourhood centre with higher density development radiating out to lower density areas where there is greater landscape sensitivity.</li> </ul>	0	0	0	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0
<ul style="list-style-type: none"> <li>Open space shall be located over higher ground with views over Cranbrook and the wider countryside promoting legibility and identity whilst preserving the wider setting to Rockbeare and Whimble.</li> </ul>	0	0	0	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0
<ul style="list-style-type: none"> <li>Established landscape features shall be retained and integrated within parks, green corridors and informal open space.</li> </ul>	0	0	0	0	0	0	+	0	++	0	+	0	0	0	0	0	0	0	0	0

## **Principle 5: Attractive pedestrian and cycle routes for commuting and leisure**

- 6.12 Principle 5 sets out objectives relating to safe and attractive pedestrian and cycle routes and encouraging these modes of travel. Measured against a range of SA objectives these bullet points score a wide range of significant positive benefits, specifically SA Objectives for Health (4), leisure and recreation (7) and Sustainable Transport (12). Positives were also recorded for most bullet points in respect of SA objectives for Community Services (2), Education (3), Greenhouse gas emissions (14) and Energy efficiency (16).

**Table 6.5 - Objectives relating to - Principle 5: Attractive pedestrian and cycle routes for commuting and leisure**

SA Objectives are on the top row – bullet points that come under the Principle in the masterplan are listed below	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
<ul style="list-style-type: none"> <li>The masterplan shall provide attractive and legible cycle and pedestrian routes within green corridors to key destinations and strategic cycle routes (in addition to shared routes with vehicles).</li> </ul>	0	0	0	++	0	0	++	0	0	0	0	++	0	+	0	+	0	0	0	0
<ul style="list-style-type: none"> <li>Direct routes shall be provided for sustainable modes of transport (filtered permeability) within green corridors and public open space.</li> </ul>	0	0	0	++	0	0	++	0	0	0	0	++	0	+	0	+	0	0	0	0
<ul style="list-style-type: none"> <li>The existing cycle path on London Road shall be extended to the eastern neighbourhood centre.</li> </ul>	0	+	+	++	0	0	++	0	0	0	0	++	0	+	0	+	0	0	0	0
<ul style="list-style-type: none"> <li>The masterplan shall promote existing quiet lanes and proposed cycleways between Cranbrook and Rockbeare, Cranbrook and Whimble and north of the railway line for recreation in the wider countryside</li> </ul>	0	+	+	++	0	0	++	0	0	0	0	++	0	+	0	+	0	0	0	0
<ul style="list-style-type: none"> <li>New and enhanced pedestrian footpaths between Cranbrook and Rockbeare shall be linked to the delivery of homes to the south east (Grange).</li> </ul>	0	+	+	++	0	0	++	0	0	0	0	++	0	+	0	+	0	0	0	0
<ul style="list-style-type: none"> <li>Footpaths between Cranbrook and Whimble shall be created and enhanced subject to land owner agreement.</li> </ul>	0	+	+	++	0	0	++	0	0	0	0	++	0	+	0	+	0	0	0	0

## Principle 6: Integration with public transport

- 6.13 Principle 6 is in respect of integration with public transport and has one bullet point of “*The movement strategy (Urban Engineering Studio, August 2017) identifies a new local bus service which would connect to the rail station and a new bus service to Exeter City Centre.*” This records significant positive impacts on respect of SA Objective for Sustainable Travel (12). There are, however, also positive impacts in respect of Community Services (2), Education and Skills (3) and health (4).



**Table 6.6 - Objectives relating to - Principle 6: Integration with public transport**

SA Objectives are on the top row – bullet points that come under the Principle in the masterplan are listed below	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenities	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
<ul style="list-style-type: none"> <li>The movement strategy (Urban Engineering Studio, August 2017) identifies a new local bus service which would connect to the rail station and a new bus service to Exeter City Centre.</li> </ul>	0	+	+	+	0	0	0	0	0	0	0	++	0	+	0	+	0	0	0	0

## Principle 7: Health provision

- 6.14 Principle 7 is in respect health provision with a single bullet point of *“It is anticipated that health and wellbeing hubs shall be co-located with other community and cultural activities within neighbourhood centres.”* On assumption that this means there actually should and will be facilities in neighbourhood centres this bullet point scores a significant positive against the SA health objective (4). It scores positives against Community services (2) by providing accessible facilities close to where people will live and Greenhouse Gas Emissions (14) on account of meaning that travel journeys to visit facilities can be expected to be shorter. Over and above these positives further positive benefits are identified in respect of Employment (18) on account of jobs that will be associated with provision and vitality and viability (19) by encouraging people to visit and uses centres and facilities.

**Table 6.7 - Objectives relating to - Principle 7: Health provision**

SA Objectives are on the top row – bullet points that come under the Principle in the masterplan are listed below	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
<ul style="list-style-type: none"> <li>It is anticipated that health and wellbeing hubs shall be co-located with other community and cultural activities within neighbourhood centres.</li> </ul>	0	+	0	++	0	0	0	0	0	0	0	0	0	+	0	0	0	+	+	0

## Conclusion on SA Testing of Design Principles

- 6.15 The SA testing of design principles indicate a generally broad picture of sustainability benefits arising from their implementation. It is noted and stressed that the design principles are strongly geared around:
- urban form and density considerations;
  - promoting sustainable transport; and
  - landscape constraints.
- 6.16 The factors are clearly not the only considerations that informed the actual masterplan itself (i.e. the coloured-in plan that shows the proposed uses for differing parcels of land) but they do have an overarching influence on the shape and pattern of development proposed for Cranbrook.

## **7 SA Testing of Alternative Site and Land Development Options**

- 7.1 This chapter of the SA considers alternative site specific development options. It does this in the context of earlier appraisal work, specifically the location principles as appraised in the preceding chapter. It is, however, important to note and revisit the fact that in the Issues and Options report there were four alternative design scenarios that were mapped out. Amongst other matters plans were produced that coloured in differing blocks of land for possible development and different uses. The Issues and Options SA work concluded that Scenario 4 was expected to have broadly more positive effects on the SA objectives than the other alternatives considered.
- 7.2 The appraisal work to date, in this report, reinforces the suitability of the Scenario 4 approach to development and site by site assessment should be seen in this context.

### **SA of suitability of land areas at and around Cranbrook for development**

- 7.3 The map/s in this chapter show Cranbrook and areas of land at and around the town that could, in theory at least, have scope for development. The map is accompanied by the table that follows it and which forms a summary of appraisal findings against the plan sustainability objectives. It should be noted that the appraisal is undertaken in the context of site suitability for built development as opposed to suitability for informal open spaces uses such as parkland.
- 7.4 Areas selected for assessment are based on examining existing Local Plan land allocations and also land that has current or past planning applications and/or areas of land being promoted for development by owners or agents – including through past Strategic Housing Land Availability Assessment (SHLAA) submissions and representations on the Cranbrook plan. The appraisal assesses sites where owners or interested parties expressions of interest in undertaking development are in the public domain.
- 7.5 In selecting these areas for SA testing the work seeks to reflect land owner or developer aspirations for development of land. Though where an owner has indicated that land is not suggested for built development, but through submission indicated it is for some form of open space/non-developed use, this maybe noted in appraisal. Some of the land areas appraised are very large and some small. For larger areas, in some instances, it has been relevant to sub-divide appraised areas to reflect different characteristics that apply to differing parts of these sites and also because the Masterplan identifies some parts of sites promoted for development for buildings and built uses but not others.
- 7.6 There are a number of areas of land around Cranbrook that have not been assessed as part of this SA work. Land at Cranbrook that has an existing planning permission has not been assessed though Local Plan allocations have. In some case land abutting or close to Cranbrook is in productive use or being-development and is not assessed, the most significant examples in size terms are the Skypark Business Park, the major freight depot and Exeter Airport. Land that forms part of extensive floodplains also has not been assessed as the floodplain, specifically large tracts of floodplain, are taken as being near to or an absolute constraint for many forms of development, specifically new housing.

7.7 In respect of land areas on the edges of Cranbrook that have not been assessed the following observations are made:

- **Land to the West (north of London Road and south of the railway) - at and around Station Road** – the local plan western allocation site has been appraised and a number of small sites that formed past SHLAA submissions on London Road and/or where there is land owner interest in development (sites C, D and E in the appraisal) have been appraised but other land areas were not previously promoted for development and have not therefore been assessed, as there is no public record of landowner interest in seeing sites come forward for development. It should be noted that there is an extensive area of floodplain to the west of London Road and beyond this is a newly developing freight depot.
- **Land to the north of the Exeter-Waterloo railway line** - assessment has not been undertaken on land to the north of the railway other than at and around Lodge Trading Estate (a small estate that is off Station Road that runs to Broadclyst – given site letter F in the appraisal). Much of the land north of the railway line is floodplain and much is in National Trust ownership and is understood to be inalienable. In respect of other land north of the railway there would, in all probability, be the need for one or more new railway crossings or significant upgrading of existing, to enable or allow for development. The challenges and expense in securing new crossings are taken as a reason to discount such options at least at this stage of Cranbrook's expansion. Furthermore other than where noted and appraisal has taken place, land north of the railway has not been promoted for development by land owners.
- **Land to the East of Cranbrook (north of London Road and south of the railway)** – the eastern allocation sites has been appraised and a small number of land areas promoted for development by land owners (specifically see sites I and J). It should be noted that the local plan allocated land is identified as J, H1 and K, the EDNCP included H2 in a past planning application but this is not a local plan allocated area of land. Other land, to the east, has not been promoted for development and should be noted that, in part, land to the east rises quite sharply and also, as you go eastward, becomes increasingly remote for Cranbrook facilities, either existing or planned.
- **Land to the south of London Road** – all land areas south of London Road have been appraised other than an area falling between the areas L1/L2 and M which was not promoted for development by the land owners and R, S and T where it is understood there are not land owner aspirations/expectations to develop.

7.8 It is stressed that the SA work assessing sites is undertaken at a higher and in principle level. Site assessment work has been undertaken by officers of the Council through office based interrogation of Geographical Information Systems as well through site visits and reviewing evidence documents.

7.9 By clear intention and design, and unless of a significant scale or prominence, it does not look into site specific details including such matters as access arrangements or detailed site specific features that may be worthy or important to protect or may place potential constraints on development. It should also be noted that assessment assumes development in general will occur and that housing will be the predominant land use and that other facilities (such as schools or shops) will be needed but these are sought and justified wholly or largely on account of housing provision. It is also

assumed that as part of the normal development management process site specific details relevant to the development of land, any site, will consider detailed matters.

- 7.10 As a general comment the success of Cranbrook to date has been reliant on securing developer contributions and direct developer provision of facilities and services. This is easiest and most credibly achieved on large scale development sites and where mixed used comprehensive development schemes come forward. On smaller scale developments, those that are not large enough in their own right to provide facilities, it can be challenging to ensure that facilities and services are provided or that developers make equivalent or proportionate contributions to such facilities, and specifically in respect of delivery of facilities. This factor is touched on in SA appraisal of sites (and is likely to be of greater importance in terms of wider factors that feed into decision making on appropriate land allocations) and it generally plays against the suitability and desirability of smaller sites as potential development options. On smaller sites the typical expectation applied in the appraisal is that housing will be the total or dominant use on any site should that site come forward for development.

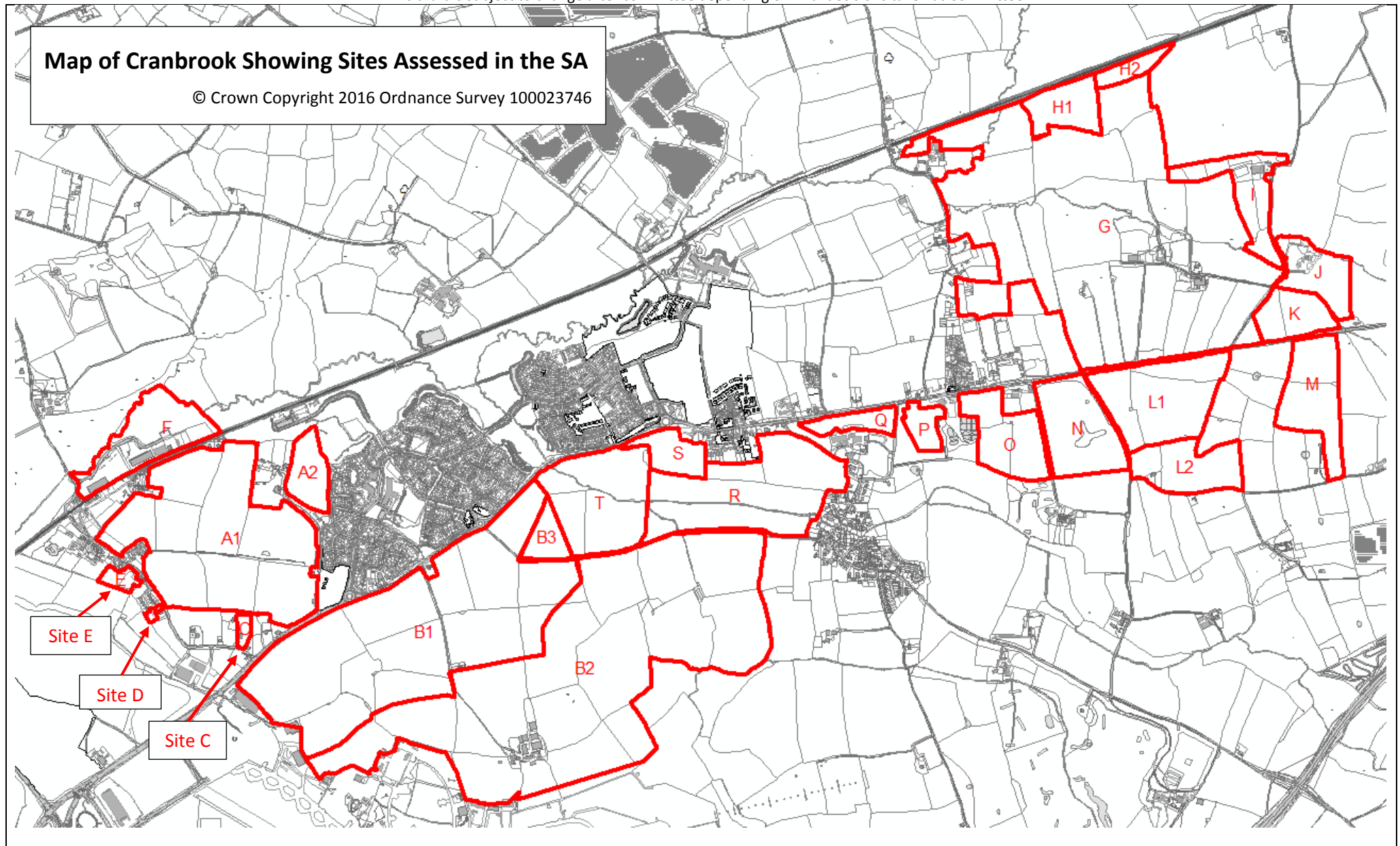




Table 7.1 - SA appraisal of alternative options

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
<b>Site A</b>	+	+	+	+	0	-	+	0	0	0	0	++	0	++	0	0	0	+	0	0
This area of land forms the Cranbrook local plan eastern allocated expansion area. Appraisal of this land area shows that it generally performs well in sustainability terms. The area is substantial in scale and therefore it offers scope to accommodate a wide range of services and facilities that can be supplied in an integrated manner alongside housing on the site as part of a comprehensive development scheme. The site also sits alongside the first phase of development at Cranbrook ensuring good access to existing services and facilities and being on the western edges of Cranbrook it is closer to major employment centres than others sites with benefits including reduced journey lengths to work and positive economic benefits. The site performs comparatively well in avoiding adverse landscape impacts though is closer to Exeter Airport than some other options and noise impacts are therefore a matter of possible concern, though mitigation measures would be possible to address adverse impacts.																				
<b>Sites B1 and B2 combined</b>	-	+	?	-	0	--	+	0	-	0	0	++	0	++	0	0	0	+	0	0
This area forms the approximate extent of the south-western expansion area proposed by the New Community partners in application 15/0046/MOUT. As the new community partners have proposed development of this extensive area it is appraised as a whole, but also see separate appraisal of area B1 below (and commentary on B2 as a standalone area). B1 and B2, as a combined area, performs well in respect of some SA indicators and less well in respect of others. Of critical relevance is the fact that large parts of B2, a substantial area in its own right, fall within an area that exceeds World Health Organisation noise limits and it is assumed for this appraisal that a substantial number of houses (as proposed in the planning application) would fall in this area; the significant adverse impacts on some of the area (B1 as opposed to B2) constitute collective negative impacts that are taken to affect the entire combined area. The most significant negative impact is in respect of SA objective 6 noise and exposure to noise. Concerns around noise, however, have wider adverse impacts when looking at other SA objective, specifically: 1) opportunities to live in a decent house; and 4) health. Education is highlighted with a question mark as impacts would depend on if a school is provided and if so where. The other negative associated with this option is in respect of landscape impacts. The existing planning application would see development on (and beyond) a ridgeline that is visible from Rockbeare village and development would have adverse landscape impacts. The positive benefits are generally related to the fact that the area is substantial in scale and therefore offers scope to accommodate a wide range of services and facilities that can be supplied in an integrated manner on the site as part of a comprehensive development scheme. The area scores especially well in respect of transport and greenhouse gas objectives, 12 and 14. Impacts are likely to be long term in nature. In respect of scope for mitigation, specifically for noise matters, this can be possible for internal spaces but there is limited scope for noise mitigation for outdoor spaces. Landscape impacts may be mitigated to some degree through quality of design and development but of more significance would be to not develop on and beyond ridgelines, this would mean limiting the degree to which eastward expansion of the B sites could occur.																				

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location																				
	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment

Site B1 only	0	+	+	0	0	-	+	0	0	0	0	++	0	++	0	0	0	+	0	0
<p>This area has been defined to exclude land to the south (area B2 see above) a large part of which falls within the 55 decibel World Health Organisation noise threshold areas. This commentary should be read in conjunction with that provided for the combined B1 and B2 site assessment. By excluding areas above 55 decibels the health impacts, SA Objective 6, are reduced to (just) a negative impact. This, however, results in objectives 1) opportunities to live in a decent house and 4) health being neutral in nature. Concerns and adverse impacts in respect to landscape considerations remain in respect of development being on top of and over the ridgeline when viewed from Rockbeare. It is relevant to note that Site B1 is somewhat smaller than the B1 and B2 combined area (potential housing capacity could fall some way short of a 1,000 dwellings) and as such this site, in its own right, may not be large enough to secure a full range of community and social and community facilities. The expectation would be that B1, whilst substantial, would be most credibly developed in terms of provision of services and facilities if a coherent scheme came forward and was implemented in conjunction with land to the north, Site A. Such an approach, with facilities centred in the north of Site B1 and/or south of Site A, and straddling London Road, would accord with SA work relating to positive benefits associated with promoting the role of London Road as a focal point for activity rather than as a bypass (see Chapter 6 of this SA report).</p>																				

**Site B2 only** – it should be noted that Site B2 has not been subject to appraisal in its own right as it is covered by the combined B1/B2 assessment and it would not be a credible development option in the absence of B1 development. If it were assessed independently then the significant negatives associated with the B1/B2 would explicitly apply to this site – most critically in respect of noise (SA Objective 6).

<b>Sites B3</b>	+	+	+	+	0	0	+	0	-	0	0	+	0	+	0	0	0	+	0	0
This small site is proposed for development by the New Community partners in application 15/0046/MOUT it is, however, not identified for development in the Masterplan. The site generally scores well when measured against the sustainability objectives. The notable negative is, however, in respect of landscape character. The site occupies an elevated position of some prominence, especially from views from the north.																				

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location																				
	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment

<b>Site C</b>	+	+	+	+	0	-	+	0	0	0	0	++	0	++	0	0	0	+	0	0
This is a small site, around 0.6 hectares, submitted through past SHLAA processes (Ref W103). Measured against sustainability objectives it achieves the same ratings as the adjoining and much larger Site A. However, this assessment would only hold true under an assumption that the services and facilities that are required to support and complement development are actually provided and available. The site, being small scale, would not be able to secure direct on site delivery of facilities and whilst this factors has not been applied in a manner that impacts on this SA assessment is does play against the site in respect of its potential suitability as an allocation for development. There is a timing issue at play in that the positive wider sustainability benefits identified would only hold true if facilities were open, available and in use before or at the same time that this site was developed and also these wider benefits would only apply (or would be most readily applicable) if there was easy access to facilities and this may only be possible through a coordinated development of this site and the adjoining Site A.																				

<b>Site D</b>	+	-	+	+	0	-	+	0	0	0	0	++	0	++	0	0	0	+	0	0
This is a small site, around 0.2 hectares, submitted through past SHLAA processes (Ref W314). Measured against sustainability objectives it achieves similar ratings as the much larger Site A that lies to its east and on the opposite side of Station Road. However, this assessment would only hold true under an assumption that the services and facilities that are required to support and complement development are actually provided and available. The site, being small scale, would not be able to secure direct on site delivery of facilities and whilst this factors has not been applied in a manner that impacts on this SA assessment is does play against the site in respect of its potential suitability as an allocation for development. Furthermore the fact that the site is on the western side of London Road, and access to Cranbrook facilities would entail crossing this road which can be quite busy, is seen in general as a negative and this, for example, accounts for a negative score in respect to SA Objective 2 which is concerned with community services. There is a timing issue at play in that the positive wider sustainability benefits identified would only hold true if facilities were open, available and in use before or at the same time that this site was developed and also these wider benefits would only apply (or would be most readily applicable) if there was easy to facilities and this may only be possible through a coordinated development of this site and the adjoining Site A.																				

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location																				
	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment

Site E	+	-	+	+	0	-	+	0	0	0	0	++	0	++	0	0	0	+	0	0
<p>This is a small site, around 0.9 hectares, submitted through past SHLAA processes (Ref W302). Measured against sustainability objectives it achieves similar ratings as the much larger Site A that lies to its east and on the opposite side of Station Road. However, this assessment would only hold true under an assumption that the services and facilities that are required to support and complement development are actually provided and available. The site, being small scale, would not be able to secure direct on site delivery of facilities and whilst this factors has not been applied in a manner that impacts on this SA assessment it does play against the site in respect of its potential suitability as an allocation for development. Furthermore the fact that the site is on the western side of London Road, and access to Cranbrook facilities would entail crossing this road which can be quite busy, is seen in general as a negative and this, for example, accounts a negative in respect to SA Objective 2 which is concerned with community services. There is a timing issue at play in that the positive wider sustainability benefits identified would only hold true if facilities were open, available and in use before or at the same time that this site was developed and also these wider benefits would only apply (or would be most readily applicable) if there was easy access to facilities and this may only be possible through a coordinated development of this site and the adjoining Site A. It should be noted that this site is categorised in the same way as Site D.</p>																				

Site F	0	-	-	0	0	-	0	0	+	0	0	-	+	-	0	0	0	--	-	0
<p>This site has a gross area of around 9 hectares but a large part of this falls in a floodplain leaving a net area of around 5.6 hectares. A large part of the site was subject to a past SHLAA submission (Ref W048) and there have been past planning applications on the site including a recently dismissed appeal for 44 dwellings (Ref 16/0263/MOUT). The site, specifically parts outside the floodplain, is or appears to be, predominantly brownfield land with some parts in productive use (albeit in some part apparently underused) and some parts are empty vacant buildings and yards and car parks. The site scores a small number of positive effects, there are, however, more negative effects, specifically including community services (2) and education (3) – these negatives specifically reflect the fact that the site has poor accessibility to facilities being separated from Cranbrook by the railway and with pedestrian access to Cranbrook that entails walking over a poor quality, low pedestrian safety, road bridge via a lengthy circuitous route. It should also be noted that the road bridge is also not ideal for extra vehicle use. A new pedestrian crossing over the railway from the site would greatly enhance access but no such bridge is currently planned and it would be extremely expensive to provide. Allied to the poor accessibility are negative scores in respect of sustainable transport (12) and greenhouse gas emissions (14) whilst a negative is recorded against town centre vitality given the poor connectivity of the site to centres in Cranbrook and the potential for residents of this site to not use Cranbrook facilities. The most significant impact in respect of this site is, however, a significant negative impact in respect of employment (18) as development for housing (or other non-employment use) would result in loss of employment land and scope for future employment uses.</p>																				

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
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<b>Site G</b>	+	+	+	+	0	+	+	0	-	0	0	+	0	+	0	0	0	0	0	0
This area of land forms the Cranbrook local plan western allocated expansion area. Appraisal of this land area shows that it generally performs well in sustainability terms. The area is substantial in scale and therefore it offers scope to accommodate a wide range of services and facilities that can be supplied in an integrated manner alongside housing on the site as part of a comprehensive development scheme. The site lies to the east of land that has outline planning permission for Cranbrook development. In due course, and assuming the outline permission site is built out, the land will have access to services that are to be provided. A negative is recorded in respect of landscape impact for this site. Most of the site, especially the western parts, are comparatively flat and not visually prominent. However on the eastern edges (especially north eastern) the land rises and has a more intimate mixture of fields and vegetation cover and development (specifically poorly planned and executed development) could have adverse landscape impacts.																				

<b>Site H1</b>	+	+	+	+	0	+	+	0	0	0	0	+	0	+	0	0	0	0	0	0
This comparatively small site of around 4.6 hectares forms part of the land that that was subject to a planning application by EDNCp (the majority of the application being covered by Site G). Site H1 is, however, not allocated in the East Devon local Plan but it is shown for development in the masterplan. The site generally performs well assessed against the sustainability considerations.																				

<b>Site H2</b>	+	+	+	+	0	+	+	0	-	0	0	+	0	+	0	0	0	0	0	0
This small site of around 1.8 hectares forms part of the land that that was subject to a planning application by EDNCP (the majority of the application being covered by Site G). Site H2 is not allocated in the East Devon local Plan and is not shown for development in the masterplan. Whilst the site generally performs well assessed against the sustainability considerations the notable exception is in respect of landscape matters. The site slopes towards the railway, is of some prominence from views to the north and is not visually that well connected to other parts of Cranbrook proposed for development.																				

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location																				
	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment

Site I	+	+	+	+	0	+	+	0	-	0	0	+	0	+	0	0	0	0	0	0
<p>This site of around 6.4 hectares is being promoted for development by agents acting for the landowner. Measured against the sustainability objectives it achieves similar ratings as the much larger Site G that lies to its west. However, this assessment would only hold true under an assumption that the services and facilities that are required to support and complement development of Site G are actually provided and available. The site, being small scale, would not be able to secure direct on site delivery of facilities and whilst this factors has not been applied in a manner that impacts on this SA assessment is does play against the site in respect of its potential suitability as an allocation for development. There is a timing issue at play in that the positive wider sustainability benefits identified would only hold true if facilities were open, available and in use before or at the same time that this site was developed and also these wider benefits would only apply (or would be most readily applicable) if easy access to facilities was also secured through development. It should be noted that a negative landscape impact is identified in respect of this site on account if its location on the easterly edge of Cranbrook and the fact that on the eastern fringes of Cranbrook landscape sensitivity increases and the sites is elevated above land to the west.</p>																				

Site J	+	+	+	+	0	+	+	- ?	-	0	0	+	0	+	0	0	0	0	0	0
<p>This site of around 5.2 hectares is being promoted for development by agents acting for the landowner. Measured against the sustainability objectives it achieves similar ratings as the much larger Site G that lies to its west. However, this assessment would only hold true under an assumption that the services and facilities that are required to support and complement development of Site G are actually provided and available. The site, being small scale, would not be able to secure direct on site delivery of facilities and whilst this factors has not been applied in a manner that impacts on this SA assessment is does play against the site in respect of its potential suitability as an allocation for development. There is a timing issue at play in that the positive wider sustainability benefits identified would only hold true if facilities were open, available and in use before or at the same time that this site was developed and also these wider benefits would only apply (or would be most readily applicable) if easy access to facilities was also secured through development. It should be noted that a negative landscape impact is identified in respect of this site on account if its location on the easterly edge of Cranbrook and the fact that on the eastern fringes of Cranbrook landscape sensitivity increases. Also a possible negative historic environment impact is noted as the overall site includes a listed building that forms part of Little Cobden. It is recognised, however, that in illustrative material submitted promoting the site the existing buildings are indicated as retained but even with retention there could be potential for adverse heritage impacts.</p>																				

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location																				
	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment

<b>Site K</b>	+	+	+	+	0	+	+	- ?	-	0	0	+	0	+	0	0	0	0	0	0
This site of around 4.4 hectares forms part of the land that that was subject to a planning application by EDNCp (the majority of the application being covered by Site G). Site K is allocated in the East Devon local Plan but is not shown for development in the masterplan. Whilst the site generally performs well when assessed against the sustainability considerations the exceptions are in respect of landscape and heritage matters. It should be noted that a negative landscape impact is identified in respect of this site on account of its location on the easterly edge of Cranbrook and a comparative remoteness from areas proposed for development. A possible negative historic environment impact noting the listed building to the north of the site at Little Cobden; adverse heritage impacts could therefore be possible.																				

<b>Site L1</b>	+	+	+	+	0	+	+	0	0	0	0	+	0	+	0	0	0	0	0	0
This site of around 12.4 hectares and it is identified for development in the masterplan. It should be noted that it was promoted for development alongside site L2, however L2 is not shown for development in the masterplan and having differing characteristics, especially in landscape terms, site L2 is appraised separately. Generally the site performs well when compared against the sustainability objectives. However this observation holds true, to some degree, under an assumption that social and community facilities can be secured alongside site development. At a site size of 12.4 hectares, if developed on a standalone basis, the site could be expected to support limited range of community facilities, therefore and to work effectively in sustainability terms the site would have to form part of or be tied in some manner to a wider process of development and delivery.																				

<b>Site L2</b>	+	+	+	+	0	+	+	0	-	0	0	+	0	+	0	0	0	0	0	0
This site of around 6.8 hectares and comments relating to this site should be read alongside those relating to Site L1. Site L2 is not identified for development in the masterplan. Generally the site performs well when compared against most sustainability objectives. Though as with L1 this would only hold true under assumption of securing community facilities. A specific negative is identified for this site in respect of landscape impacts on account of potential for development being of some prominence from views from the south.																				



SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location																				
	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment

Site M	+	0	0	0	0	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0
This site of around 8.2 hectares is being promoted for development by agents acting for the landowner. The site is not identified for development in the Cranbrook masterplan and has a remoteness from built development that is promoted for development, separated by open fields and a woodland area. Measured against the sustainability objectives the site general achieves neutral responses, it is physically quite close to the proposed neighbourhood centre but not so close to the proposed school. Of more importance than proximity, however, will be the issue of whether safe pedestrian access can or would be achieved to these facilities. A specific negative is identified for this site in respect of landscape impacts on account of its location beyond the proposed easterly edges of Cranbrook and the fact that on the eastern side landscape sensitivity increases. The greatest concern in respect of landscape sensitivity applies, however, to the southern parts of the site where development could be of some prominence from views from the south and also the site lies beyond and separated from the proposed areas of development of Cranbrook by a large block of woodland.																				

Site N	+	+	+	+	0	+	+	0	0	0	0	+	0	+	0	0	0	0	0	0
This site extends to around 9.1 hectares and is identified in the masterplan for development. Generally the site performs well when compared against the sustainability objectives. However this observation holds true, to some degree, under an assumption that social and community facilities can be secured alongside site development. At a site size of 9.1 hectares, if developed on a standalone basis, the site could be expected to support limited range of community facilities, therefore and to work effectively in sustainability terms the site would have to form part of or be tied in some manner to a wider process of development and delivery.																				

Site O	+	+	+	+	0	+	+	0	0	0	0	+	0	+	0	0	0	0	0	0
This site extends to around 7.1 hectares and is identified in masterplan for development. Generally the site performs well when compared against the sustainability objectives. However this observation holds true, to some degree, under an assumption that social and community facilities can be secured alongside site development. At a site size of 7.1 hectares, if developed on a standalone basis, the site could be expected to support limited range of community facilities, therefore and to work effectively in sustainability terms, the site would have to form part of or be tied in some manner to a wider process of development and delivery. It should be noted that this site forms part of a larger land area submitted the Issues and Options stage of plan consultation. In illustrative material that accompanied the submission a large part of the total submission site was not proposed for actual development, however as this section of land (Site O) was proposed to be built on it has been appraised. The other areas of land that were proposed for development in the same representation are appraised as Site P and Site Q in this assessment.																				



SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment

Site P	+	+	+	+	0	+	+	0	-	0	0	+	0	+	0	0	0	0	0	0
This site is around 2 hectares in size, and it is not identified in masterplan for development. Across a number of the sustainability objectives the site performs well, the notable exception, however, is in respect of landscape considerations. The landscape work that informed the masterplan points to the unacceptability, in landscape impact terms, of development of this land. The assessment of this site should be read in conjunction with that for Site 0. The negative landscape considerations relate to both visual impact concerns and also the fact that the village of Rockbeare is to the south of and close to Cranbrook and the village currently has a particular character in the landscape that is defined by surrounding open/undeveloped countryside. Development of this site would erode to a great extent that open character, noting as well that the site lies within a local plan Green Wedge.																				

Site Q	+	+	+	+	0	+	+	0	--	0	0	+	0	+	0	0	0	0	0	0
This site is around 2.3 hectares in size, and it is not identified in masterplan for development. Across a number of the sustainability objectives the site performs well, the notable exception, however, is in respect of landscape considerations. The landscape work that informed the masterplan points to the unacceptability, in landscape impact terms, of development of this land. The assessment of this site should be read in conjunction with that for Site 0. The significant negative landscape considerations relate to both visual impact concerns and also the fact that the village of Rockbeare is to the south of and close to Cranbrook and the village currently has a particular character in the landscape that is defined by surrounding open/undeveloped countryside. Development of this site would erode to a great extent that open character, noting as well that the site lies within a local plan Green Wedge.																				

### **Sites R, S and T**

A formal appraisal of sites R, S and T has not been undertaken as these sites have not been proposed for development by landowners and they are not proposed for development in the masterplan. To provide an overview of land on this southern side of Cranbrook a succinct summary comment is however provided.

**Site R** - is in the same ownership/control as the promoter of Site O, P and Q. Site R is indicatively show in issues and options submissions as open space (as is land to the south of O, P and Q). Site R itself is visually prominent from Rockbeare and other points.

**Site S** – has not been promoted for development but is visually prominent.

**Site T** – this site falls in EDNCp control but it has not been promoted by them for built development, rather it is seen as having an open space use and part is in the Cranbrook Country Park.

## Conclusions on Comparative Assessment of Site Development Options

- 7.11 The site specific assessment shows that the sites identified for development through the Cranbrook masterplan generally perform better in the sustainability assessment than those that are not identified. Landscape impact considerations were key to informing the Masterplan and through the SA work a number of sites on or close to the periphery of Cranbrook, especially on the southern side and south of London Road perform quite significantly less well than other options. On the eastern and western fringes of Cranbrook, beyond the Local Plan allocated sites, a number of smaller scale sites compare reasonably well in comparison to local plan allocations though there are clear concerns in respect of the ability of these sites to support and secure infrastructure and facilities alongside housing development.

## **8 Potential Future Policies for the Cranbrook Plan**

- 8.1 There is an annex to the Cranbrook masterplan that lists a number of subject matters that it is proposed should be addressed through future policy in the Cranbrook Plan (the future planning policy document for Cranbrook). The proposed policy options are set out in the chapter along with alternative options to those being proposed, though in some cases realistic alternatives are not considered to exist.
- 8.2 The alternative potential approaches were identified by officers of the Council and in a number of cases a do-nothing approach is regarded as the relevant alternative option. This section uses the format and referencing used in the policy consultation document.
- 8.3 It is stressed that appraisal in this chapter is explicitly undertaken in respect of the wording set out in the proposed policy approach. For the allocation policies in particular no attempt has been made to assume what else may come forward on allocated site. It should also be noted that the scores noted in the tables are specifically recorded in respect of predicted direct impacts of policies rather than the potential secondary, cumulative or synergetic impacts, though the supporting commentary does refer to potential wider considerations and impacts.

## Ref 1.0 - Allocations - Expansion areas

- 8.4 The policy expectation is to allocate 2 parcels of land to the south east and south west of the existing town for mixed use development. Local Plan Strategy 12 (S12) allocates land for mixed use development including around 6300 new homes at Cranbrook. The policy also requires the delivery of a further 1550 houses and associated jobs social, community and education facilities and infrastructure within the Cranbrook Plan Area identified on the West End Inset map. This policy sets out where this residual development will occur.

### Alternative Options

- 8.5 Through the appraisal work undertaken to date the in-principle approach of allocating two expansion areas, in order to provide for local plan compliant levels of growth has been established so no realistic alternatives are identified.

### Direct impacts

- 8.6 The allocation of land should provide confidence to secure and seek to secure facilities and high quality development and for this reason a series of positives are identified against those SA objectives that relates to accessibility to services and facilities. A significant positive effect is noted in respect to new homes. Cranbrook has a strong track record of housing delivery and this is seen as a specific area where positive results should arise through land allocations.
- 8.7 Uncertainty over the nature of impacts is identified for potential impacts on SA objectives relating to impacts on such matters as natural environment and heritage. The actual impacts that could occur would be more specifically addressed through other plan policies but as this policy is non-specific in nature it is not possible to be more precise about impacts and negatives could be possible if inappropriate more detailed policies are in place.

### Secondary, cumulative and synergistic impacts

- 8.8 There can be expectations of all sorts of knock-on impacts arising in respect of what flows from this policy into more detailed plan policies. However at this part of the appraisal no further comment is made.

### Permanence and Timescale of impacts

- 8.9 The development that allocations will provide for, and the impacts arising, can be expected to be permanent in nature.

### Scope for Mitigation

- 8.10 The need will exist for more detailed policies, following on from this overarching policy, to look at mitigation for potential adverse impacts. Such mitigation could be relevant where development might otherwise adversely impact on heritage and natural environment assets.

Table 8.1 - SA appraisal of Allocations - Expansion Areas

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
To allocate 2 parcels of land to the south east and south west of the existing town for mixed use development	++	+	+	+	+	+?	?	?	?	0	?	+	0	+	?	+	0	+	0	+

## Ref 2.0 - Area Specific requirements – Bluehayes (Western Area)

8.11 The policy expectation is that within the Western expansion area provision will be made for mixed use development and the infrastructure as set out within the masterplan; specifically including:

- the delivery of a 2 form Entry Primary School;
- the accessing and enhancement of the nature park
- connectivity with Cranbrook Station
- delivery of one of two gypsy and traveller sites required for the town
- delivery of a Neighbourhood centre along the London Road frontage
- allocation of land for meanwhile uses
- identification of suitable uses for mixed use areas

### Alternative Options

8.12 The earlier SA work points to the suitability of this allocation for mixed use development and as such no alternatives options are appraised.

### Direct impacts

8.13 The specific facilities noted in the proposed allocation text should provide for significant positive impacts in respect of two specific objectives - 2) community services and 3) education. Positives are noted specifically in respect of employment benefits through provision in the policy and also for housing noting specific reference to gypsy site provision and leisure and recreation through links to the park.

### Secondary, cumulative and synergistic impacts

8.14 There can be expectations of all sorts of knock-on impacts arising in respect of what flows from this policy into more detailed plan policies. Specific detailed commentary is not provided at this point of appraisal but under a well-developed scheme for the allocation many of the SA objectives could see some types of positive related impact; though conversely a poor executed scheme could see adverse impacts.

### Permanence and Timescale of impacts

8.15 The development that allocations will provide for, and the impacts arising, can be expected to be permanent in nature. There is, however, an importance to early delivery for uses to be established in the fabric of Cranbrook.

#### Scope for Mitigation

- 8.16 Given the higher level nature of this policy there is no specific mitigation is identified as more detailed lower tier policy, detailing more detail, will be the relevant place for mitigation measures to be identified.



Table 8.2 - SA appraisal of Ref 2.0 - Area Specific requirements - Bluehayes (Western Area)

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
<p>Within the Western expansion area provision will be made for mixed use development and the infrastructure as set out within the masterplan; specifically including:</p> <ul style="list-style-type: none"> <li>the delivery of a 2 form Entry Primary School;</li> <li>the accessing and enhancement of the nature park</li> <li>connectivity with Cranbrook Station</li> <li>delivery of one of two gypsy and traveller sites required for the town</li> <li>delivery of a Neighbourhood centre along the London Road frontage</li> <li>allocation of land for meanwhile uses</li> <li>identification of suitable uses for mixed use areas</li> </ul>	+	++	++	0	0	0	+	0	0	0	0	0	0	0	0	0	0	+	0	+

## Ref 2.1 - Area Specific requirements – Treasbeare (Southwestern Area)

8.17 The policy expectation is within south western expansion area provision will be made for mixed use development and the infrastructure as set out within the masterplan; specifically including:

- delivery of a Neighbourhood centre along the London Road;
- a significant area of dedicated employment space
- delivery of a sports hub
- safeguarding of land for energy centre expansion
- provision of noise mitigation scheme to attenuate by at least 15db noise derived from the engine testing facility at Exeter Airport and for this to be operational prior to occupation of houses within the noise sensitive area
- a requirement for good levels of integration and connection within the existing town.
- allocation of land for meanwhile uses
- identification of suitable uses for mixed use areas

### Alternative Options

8.18 The earlier SA work points to the suitability of this allocation for mixed use development and as such no alternatives options are appraised.

### Direct impacts

The specific facilities noted in the proposed allocation text are identified as providing for significant positive impacts in respect of four specific objectives – 7) because of specific provision of a sports hub, 17) because of land specifically be identified for an energy centre and 18) and 20) which are in respect of employment outcomes and they relate to positive employment provision in policy and specifically in respect of the significant employment space.

### Secondary, cumulative and synergistic impacts

8.19 There can be expectations of all sorts of knock-on impacts arising in respect of what flows from this policy into more detailed plan policies. Specific detailed commentary is not provided at this point of appraisal but under a well-developed scheme for the allocation many of the SA objectives could see some types of positive related impact; though conversely a poor executed scheme could see adverse impacts.

### Permanence and Timescale of impacts

8.20 The development that allocations will provide for, and the impacts arising, can be expected to be permanent in nature. There is, however, an importance to early delivery for uses to be established in the fabric of Cranbrook.

### Scope for Mitigation

- 8.21 Given the higher level nature of this policy there is no specific mitigation identified other than detailed points highlighted below as more detailed lower tier policy, detailing more detail, will be the relevant place for mitigation measures to be identified. The specific issues identified are in respect of potential for adverse noise impacts (SA Objective 6) given relative proximity to the airport and education (SA objective 3) given that there is no actual school proposed on the site. In respect to noise there would appear to be good grounds to seek very careful development so noise issues do not become a problem and it is noted that there is school provision to the north of this site albeit across the busy and fast flowing traffic on London Road. Development should provide for a safe and secure cross points to allow for ease of access to education facilities.

Table 8.3 - SA appraisal of Treasbeare (Southwestern Area)

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
<p>Within the south western expansion area provision will be made for mixed use development and the infrastructure as set out within the masterplan; specifically including:</p> <ul style="list-style-type: none"> <li>• delivery of a Neighbourhood centre along the London Road;</li> <li>• a significant area of dedicated employment space</li> <li>• delivery of a sports hub</li> <li>• safeguarding of land for energy centre expansion</li> <li>• provision of noise mitigation scheme to attenuate by at least 15db noise derived from the engine testing facility at Exeter Airport and for this to be operational prior to occupation of houses within the noise sensitive area</li> <li>• a requirement for good levels of integration and connection within the existing town.</li> <li>• allocation of land for meanwhile uses</li> <li>• identification of suitable uses for mixed use areas</li> </ul>	0	+	-	0	0	-?	++	0	0	0	0	0	0	++	0	+	0	++	0	++

## Ref 2.2 - Area Specific requirements - Cobdens (Eastern area)

8.22 The policy expectation is that within the eastern expansion area provision will be made for mixed use development and the infrastructure as set out within the masterplan; specifically including:

- delivery of a Neighbourhood centre along the London Road;
- undergrounding of existing overhead power lines
- delivery of one of two gypsy and traveller sites required for the town
- the delivery of Education facilities;
- allocation of land for meanwhile uses
- identification of suitable uses for mixed use areas

### Alternative Options

8.23 The earlier SA work points to the suitability of this allocation for mixed use development and as such no alternatives options are appraised.

### Direct impacts

8.24 The specific facilities noted in the proposed allocation text should provide for significant positive impacts in respect of two specific objectives - 2) community services and 3) education given facility provision on the site. Positives are noted specifically in respect of employment benefits through provision in the policy.

### Secondary, cumulative and synergistic impacts

8.25 There can be expectations of all sorts of knock-on impacts arising in respect of what flows from this policy into more detailed plan policies. Specific detailed commentary is not provided at this point of appraisal but under a well-developed scheme for the allocation many of the SA objectives could see some types of positive related impact; though conversely a poor executed scheme could see adverse impacts.

### Permanence and Timescale of impacts

8.26 The development that allocations will provide for, and the impacts arising, can be expected to be permanent in nature. There is, however, an importance to early delivery for uses to be established in the fabric of Cranbrook.

### Scope for Mitigation

8.27 Given the higher level nature of this policy there is no specific mitigation is identified as more detailed lower tier policy, detailing more detail, will be the relevant place for mitigation measures to be identified. Notwithstanding this general observation a ? is noted in respect of landscape impacts. The undergrounding of overhead cables should reduce the adverse visual impacts the

cables currently create but the more easterly parts of this are, in particular, are of landscaped sensitivity and poor development could lead to adverse impacts, this points to the importance of carefully managed high development that is successfully integrated into the landscape in these more easterly areas.

Table 8.4 - SA appraisal of Area Specific requirements - Cobdens (Eastern area)

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
<p>Within the eastern expansion area provision will be made for mixed use development and the infrastructure as set out within the masterplan; specifically including:</p> <ul style="list-style-type: none"> <li>• delivery of a Neighbourhood centre along the London Road;</li> <li>• undergrounding of existing overhead power lines</li> <li>• delivery of one of two gypsy and traveller sites required for the town</li> <li>• the delivery of Education facilities;</li> <li>• allocation of land for meanwhile uses</li> <li>• identification of suitable uses for mixed use areas</li> </ul>	+	++	++	0	0	0	0	0	?	0	0	0	0	0	0	0	0	+	0	+

### Ref 2.3 - Area Specific requirements - Grange (south eastern Area)

8.28 The policy expectation within the south eastern expansion area, provision will be made for mixed use development and the infrastructure as set out within the masterplan; specifically including:

- delivery of a Neighbourhood centre along the London Road;
- undergrounding of existing electric cables;
- allocation of land for meanwhile uses
- identification of suitable uses for mixed use areas

#### Alternative Options

8.29 The earlier SA work points to the suitability of this allocation for mixed use development and as such no alternatives options are appraised.

#### Direct impacts

8.30 This policy is identified with having largely neutral impacts with just two positives identified on account of specific provision set out in policy, these are for SA objectives 2) community services and 18) employment. A positive is also identified for 9) landscape impacts but a negative for education as there is no school provision on site.

#### Secondary, cumulative and synergistic impacts

8.31 There can be expectations of all sorts of knock-on impacts arising in respect of what flows from this policy into more detailed plan policies. Specific detailed commentary is not provided at this point of appraisal but under a well-developed scheme for the allocation many of the SA objectives could see some types of positive related impact; though conversely a poor executed scheme could see adverse impacts.

#### Permanence and Timescale of impacts

8.32 The development that allocations will provide for, and the impacts arising, can be expected to be permanent in nature. There is, however, an importance to early delivery for uses to be established in the fabric of Cranbrook.

#### Scope for Mitigation

8.33 Given the higher level nature of this policy there is no specific mitigation identified other than detailed points highlighted below as more detailed lower tier policy, detailing more detail, will be the relevant place for mitigation measures to be identified. The specific issues identified is in respect to school provision noting that the nearest school will be across the busy and fast flowing London Road. Mitigation should allow and provide for safe road crossing.



Table 8.5 - SA appraisal of Area Specific requirements - Grange (south eastern Area)

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
<p>within the south eastern expansion area, provision will be made for mixed use development and the infrastructure as set out within the masterplan; specifically including:</p> <ul style="list-style-type: none"> <li>• delivery of a Neighbourhood centre along the London Road;</li> <li>• undergrounding of existing electric cables;</li> <li>• allocation of land for meanwhile uses</li> <li>• identification of suitable uses for mixed use areas</li> </ul>	0	+	-	0	0	0	0	0	+	0	0	0	0	0	0	0	0	+	0	0

## Ref 2.4 - Area Specific requirements - Town Centre

8.34 The policy expectation to ensure the delivery of an economically successful town centre and one that meets its aspirations as being the focus of a healthy New Town, policy will support and make provision for the delivery of:

- a health & wellbeing campus (including primary medical centre and children's centre);
- the safeguarding of land for a future leisure centre;
- Town Council Offices;
- Extra care housing;
- Transformer station for the roll out of District Heating to the expansion areas;
- allocation of land for meanwhile uses;
- as well as setting out a list of uses that will be supported.

### Alternative Options

8.35 The alternative identified to not have a policy for the town centre and instead to respond to planning applications that may come in on an ad-hoc or non-policy informed basis.

### Direct impacts

8.36 Of the two approaches the first, actively planning for a town centre and specifying uses within it, scores a number of neutral impacts and also, on account of component elements, a number of positives. Under the second approach it is unknown, or assumed unknown, as to what might come forward. Given the unknowns the second approach records a number of question marks in respect of potential impacts, though it is appreciated that under a no policy approach it could be that for commercial or other reasons some of the specified uses could anyway be developed, and perhaps other non-listed in policy uses as well.

8.37 Notwithstanding possible flexibilities associated with a no policy approach the positive benefits of an explicit policy are favoured as it does have clear identified specific positives associated with it. SA objectives 4) health and 7) leisure and recreation are identified as having significant positives as policy explicitly provides land for a health and wellbeing campus and a leisure centre. Other positives cover a range of SA considerations including housing (1), on account of elderly person provision, community services (2) and those related to green issues and transport (12, 14 and 16) and economic development (18 and 19).

### Secondary, cumulative and synergistic impacts

8.38 The healthy, mixed use and prosperous town centre sought after under policy could be expected to have a wide range of positive impacts on other sustainability considerations. For example a mixed use vibrant town centre is likely to lower crime levels (SA Objective 5) than one that does not have

these characteristics, likewise a vibrant town centre is more likely to encourage inward investment (SA Objective 20).

#### Permanence and Timescale of impacts

- 8.39 A town centre should, eventually be a permanent feature and early delivery is clearly very desirable. More positive temporary measures can be expected, as well, through provision of land for *“meanwhile uses”*.

#### Scope for Mitigation

- 8.40 Whilst there are no specific identified negatives to mitigate against there may be scope to broaden policy coverage for the town centre to help turn predicted neutral impacts into positive outcomes (or to secure significant positive outcomes).

Table 8.6 - SA appraisal of Area Specific requirements - Town Centre

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
<p>The policy expectation to ensure the delivery of an economically successful town centre and one that meets its aspirations as being the focus of a healthy New Town, policy will support and make provision for the delivery of:</p> <ul style="list-style-type: none"> <li>• a health &amp; wellbeing campus (including primary medical centre and children's centre);</li> <li>• the safeguarding of land for a future leisure centre;</li> <li>• Town Council Offices;</li> <li>• Extra care housing;</li> <li>• Transformer station for the roll out of District Heating to the expansion areas;</li> <li>• allocation of land for meanwhile uses;</li> <li>• as well as setting out a list of uses that will be supported.</li> </ul>	+	+	0	++	0	0	++	0	0	0	0	+	0	+	0	+	0	+	+	0
The alternative identified to not have a policy for the town centre and instead to respond to planning applications that may come in on an ad-hoc or non-policy informed basis	?	?	0	?	0	0	?	0	0	0	0	0	0	0	0	?	0	?	?	0

## Ref 2.5 - Area Specific requirements - Gypsy and Traveller Allocation

- 8.41 Proposed policy advises of Provision of two gypsy and traveller sites and their delivery in accordance with adopted SPD. This policy of provision should also be read alongside land allocation policies Ref 2.0 - Area Specific requirements - Bluehayes (Western Area) and Ref 2.2 - Area Specific requirements – Cobdens (eastern Area) that explicitly plan for gypsy sites.

### Alternative Options

- 8.42 The identified alternative is to not plan for gypsy site provision and it is assumed not have planned gypsy provision at Cranbrook. Under this alternative it could be that in reality there would not be any gypsies at Cranbrook though there is also the very real possibility of unauthorised encampments occurring in unplanned locations, such as at the side of roads or in car parks. Cranbrook has seen such unauthorised encampments in the past and it lies on historic traveller routes and close to major highways.

### Direct impacts

- 8.43 There are specific positive benefits associated with policy for gypsy site provision. Most notably SA objective 1 for housing given that policy would actually secure sites for gypsies to live on, but also objective 4 for health given that ill-health can be a major issue in the gypsy community and with Cranbrook being a health new town access to health facilities can be seen as a positive benefit. Questions marks in respect of impacts of site provision are SA Objective 3 – education and 5 – crime. A concern has been raised that schools in Cranbrook (see SA Objective 3) already have high numbers of pupils in special needs and that because a disproportionately large number of gypsy children fall into the category it could put extra pressure on schools. In respect to crime there were submissions made at issues and options consultation that suggested/argued that criminal activity (rates higher than amongst the settled community) may be associated with gypsies. Whilst we do not have evidence to collaborate this points there is a ? against SA Objective 5).
- 8.44 In contrast to the positive outcome associated with actual provision there are negatives associated with not making provision. Lack of housing is one such negative, albeit with a question marks as it is unknown if unauthorised encampments may occur. There are also negatives associated with schools and health (reflecting the ability of the gypsy community to access services if they do not have authorised long term sites to live on). Possible negatives concerns are also identified in respect of crime and noise, especially with the real possibility of more unauthorised encampments should explicit provision not be made.

### Secondary, cumulative and synergistic impacts

- 8.45 Whilst no specific secondary, cumulative and synergistic impacts noted they could occur through site provision.

### Permanence and Timescale of impacts

- 8.46 The expectation is that sites would be of a permanent nature therefore there would be the expectation of permanence to impacts. Timing is important in respect to site provision as there is a pressing current need so early delivery of sites would be desirable.

#### Scope for Mitigation

- 8.47 Where there is potential for negative impacts associated with site provision (or even non-provision and potential unauthorised encampments) there should be scope to look at mitigation measures at an early stage. In part these can be through on site design but also in respect of possible service provision impacts off site, specifically including in respect of health and education.

Table 8.7 - SA appraisal of .....

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Proposed policy advises of Provision of two gypsy and traveller sites and their delivery in accordance with adopted SPD.	+	0	?	+	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
The identified alternative is to not plan for gypsy site provision and it is assumed not have planned gypsy provision at Cranbrook.	-?	0	-	-	-?	-?	0	0	0	0	0	0	0	0	0	0	0	0	0	0

## Ref 2.6 - Area Specific requirements - Education Land

- 8.48 Policy provides for Allocation of 1.6ha of land adjacent to the existing Education Campus explaining that this land is required to meet the identified Education needs arising from the development of the town.

### Alternative Options

- 8.49 On the basis that there is the need for schools to serve Cranbrook it is assumed that there is no practical alternative option than to provide for the schooling provision and this school land.

### Direct impacts

- 8.50 A single direct significant positive benefit against SA Objective 3 is identified for this policy proposal.

### Secondary, cumulative and synergistic impacts

- 8.51 Provision of a school/education facility could be expected to have a series of secondary, cumulative and synergistic positive impacts that could include SA Objectives 2) community services, 4) health, 7 leisure and recreation and 12) sustainable travel. Though such benefits would depend on considerations accessibility of facilities, including physical ease of walking to them but also wider community access.

### Permanence and Timescale of impacts

- 8.52 Any school provision should be seen as permanent in nature and so impacts should be considered to be long term, but also provision should be made alongside or prior to need actually arising.

### Scope for Mitigation

- 8.53 To secure the maximum benefits there could be thought given to accessibility of and to the school and how policy can support this.



Table 8.8 - SA appraisal of Area Specific requirements - Education Land

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy provides for Allocation of 1.6ha of land adjacent to the existing Education Campus explaining that this land is required to meet the identified Education needs arising from the development of the town.	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

### Ref 3.1.1 - Strategic Infrastructure – Rail – Passing Loop

- 8.54 Policy provides for Provision of a passing loop on the railway line to enable enhanced train services. It should be noted that in considering this option the assessment is undertaken without reference to any costs attached or more specifically what else could be done with any monies that should a passing loop not be provided could be spent on other proposals or initiatives.

#### Alternative Options

- 8.55 The identified alternative is identified as not planning for and not having a passing loop.

#### Direct impacts

- 8.56 The provision of a passing loop is seen as offering a significant positive benefit in respect of SA Objective 12) sustainable transport as it should greatly encourage people to use the train service. AS positive, thorough encouraging train use, is also identified against SA Objective 14. In contrast, however, any new major infrastructure work, as this would be, could have negative landscape impacts (SA Objective 9) whilst there may be possibility for wider negative environmental or pollution impacts.
- 8.57 To not have a passing loop would retain the status quo and so neutral impacts are noted.

#### Secondary, cumulative and synergistic impacts

- 8.58 It could be expected that that should a passing loop go ahead there would be a range of potential secondary, cumulative and synergistic impacts. For example positive benefits may come through in respect of health (4) by encouraging people to walk to catch trains (rather than just jumping in a car) or through better train services leading to positive economic outputs with Cranbrook being a more appealing place to do and locate businesses.

#### Permanence and Timescale of impacts

- 8.59 Any passing loop would be permanent in nature.

#### Scope for Mitigation

- 8.60 Landscape impacts, in particular, could be significant and so would warrant careful consideration in any scheme that is proposed.

Table 8.9 - SA appraisal of Strategic Infrastructure – Rail – Passing Loop

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy provides for Provision of a passing loop on the railway line to enable enhanced train services.	0	0	0	0	0	0	0	0	-?	0	0	++	0	+	0	0	0	0	0	0
The identified alternative is identified as not planning for and not having a passing loop	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

### Ref 3.1.2 - Strategic Infrastructure – Second Platform at Cranbrook Station

- 8.61 Policy provides for support the provision of a second platform and overbridge at the existing railway station. It should be noted that in considering this option the assessment is undertaken without reference to any costs attached or more specifically what else could be done with any monies that should a passing loop not be provided could be spent on other proposals or initiatives.

#### Alternative Options

- 8.62 The identified alternative is identified as not planning for and not having a second platform.

#### Direct impacts

- 8.63 The provision of a second platform is seen as offering a significant positive benefit in respect of SA Objective 12) sustainable transport as it should greatly encourage people to use the train service. A positive, thorough encouraging train use, is also identified against SA Objective 14. In contrast, however, any new major infrastructure work, as this would be, could have negative landscape impacts (SA Objective 9) whilst there may be possibility for wider negative environmental or pollution impacts.
- 8.64 To not have a second platform would retain the status quo and so neutral impacts are noted.

#### Secondary, cumulative and synergistic impacts

- 8.65 It could be expected that that should a second platform go ahead there would be a range of potential secondary, cumulative and synergistic impacts. For example positive benefits may come through in respect of health (4) by encouraging people to walk to catch trains (rather than just jumping in a car). A second platform would also require provision of a pedestrian crossing over the railway and if this were available for public use (and not just railway users use) it could have secondary benefits in respect of SA Objective 7) leisure and recreation by opening up access to the wider countryside for walking or cycling.

#### Permanence and Timescale of impacts

- 8.66 Any second platform would be permanent in nature.

#### Scope for Mitigation

- 8.67 Landscape impacts, in particular, could be of some significance and so would warrant careful consideration in any scheme that is promoted.

Table 8.10 - SA appraisal of a second platform at Cranbrook station

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy provides for Support the provision of a second platform and overbridge at the existing railway station	0	0	0	0	0	0	0	0	-?	0	0	++	0	+	0	0	0	0	0	0
The identified alternative is identified as not planning for and not having a second platform	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

### Ref 3.1.3 – Strategic Infrastructure - A second railway station at Cranbrook

- 8.68 Policy provides for safeguard land for the delivery of a second railway station. It should be noted that in considering this option the assessment is undertaken without reference to any costs attached or more specifically what else could be done with any monies that should a passing loop not be provided could be spent on other proposals or initiatives. It should also be noted that the policy does not explicitly plan for a second railway station but rather it safeguards the land so that should proposals for a station come forward in the future there will be land available upon which the station can be built. One consequence of safeguarding land for station use is that it would stop uses or development coming forward on that land that would otherwise prejudice or compromise the use or potential of that land for a second station. Whilst these comments should be noted the appraisal is undertaken on assumption of station provision.

#### Alternative Options

- 8.69 The alternative is identified as not planning for and not having a second railway station.

#### Direct impacts

- 8.70 The provision of a second station is seen as offering a significant positive benefit in respect of SA Objective 12) sustainable transport as it should greatly encourage people to use the train service. A positive, thorough encouraging train use, is also identified against SA Objective 14. In contrast, however, any new major infrastructure work, as this would be, could have negative landscape impacts (SA Objective 9) whilst there may be possibility for wider negative environmental or pollution impacts.
- 8.71 In respect of not planning for a second station a full row of neutral scores are recorded as this approach would retain the status quo. However, some of this neutral could have unknowns or positives attached against them. If land is retained for potential station development then it could stop other positive uses or development of land from coming forward. Under the second option of not safeguarding the land it could be that there would actually be positive benefits.

#### Secondary, cumulative and synergistic impacts

- 8.72 It could be expected that that should a second station go ahead there would be a range of potential secondary, cumulative and synergistic impacts. For example positive benefits may come through in respect of health (4) by encouraging people to walk to catch trains (rather than just jumping in a car).

#### Permanence and Timescale of impacts

- 8.73 Any second would be permanent in nature.

#### Scope for Mitigation

- 8.74 Landscape impacts, in particular, could be of some significance and so would warrant careful consideration in any scheme that is promoted.

Table 8.11 - SA appraisal of Safeguard land for the delivery of a second railway station

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy provides for safeguard land for the delivery of a second railway station	0	0	0	0	0	0	0	0	-?	0	0	++	0	+	0	0	0	0	0	0
The alternative is identified as not planning for and not having a second railway station	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

### Ref 3.2.1 - Strategic Infrastructure - High quality bus services

- 8.75 Policy provides for High quality bus services to the town, linking it with surrounding area and services. Cranbrook already has regular bus services but the expectation under plan policy would be for improvements in these services and new bus provision to be provided alongside further expansion and development of the new town.

#### Alternative Options

- 8.76 The alternative option identified is to not have high quality bus services.

#### Direct impacts

- 8.77 The provision of high quality bus services is identified as having a significant positive impact against SA Objective 12 of promoting sustainable travel. Bus can be a cost effective and flexible means to provide alternative travel options to the private car. The other direct positive benefit identified through this policy approach is in respect to reducing greenhouse gas emissions, noting that efficient bus services emit lower greenhouse gas levels than comparative journeys (especially when under filled) made by cars. The option of not providing high quality bus services has identified corresponding negative impacts.

#### Secondary, cumulative and synergistic impacts

- 8.78 The provision of high quality bus services can be expected to have a wide range of positive knock-on or related impacts when looking at the SA objectives more widely. In a town where buses are high quality and widely used people are far more likely to also walk more and therefore potentially have better health, accessibility to community services for more people could improve, buses use roads in a more space efficient manner and therefore there could be potential for less road space freeing up options to use land for other, more sustainability productive uses, etc.

#### Permanence and Timescale of impacts

- 8.79 The impacts of better public transport should be permanent, but for the benefits to be sustained (and signifying accessibility and mobility issues to not arise in the future) there should be confidence that services will be operational, affordable and well used over the long term.

#### Scope for Mitigation

- 8.80 As no direct negatives are identified from this objective specific mitigation is not identified. However, as noted above, securing provision into the long term will be essential.



Table 8.12 - SA appraisal of Strategic Infrastructure – High Quality Bus services

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy provides for High quality bus services to the town, linking it with surrounding area and services	0	0	0	0	0	0	0	0	0	0	0	++	0	+	0	0	0	0	0	0
The alternative option identified is to not have high quality bus services	0	0	0	0	0	0	0	0	0	0	0	-	0	-	0	0	0	0	0	0

### Ref 3.3.1 - Strategic Infrastructure - London Road Improvements

- 8.81 Policy provides for requirement for a dedicated London Road Strategy which shall coordinate access for each expansion area. The supporting text to the policy explains *“London Road forms the single most important connection serving both the existing town and all expansion areas. Road widths, junction design and movement along and across the road are fundamental to the success of an integrated and balanced community.”*

As the proposed policy is about process matters, the production of a strategy for London Road, rather than an actual sets out spatially of otherwise defined requirements for development, an appraisal of this ‘policy’ has not been undertaken. In future iteration of the Cranbrook Plan, and this overall SA work, it may be that an actual more precise policy is produced and formal assessment may become appropriate.

### Ref 3.4.1 - Strategic Infrastructure - Exeter Airport and navigational Aids

- 8.82 This ‘policy’ advises that

“Development within the currently identified airport safeguarding area will

- need to be assessed for potential interference with the Navigational Aids system that is currently in operation and/or
- need to support the provision of a renewed system to reduce the degree of likely impact on airport safety and facilitate the delivery of development”

- 8.83 The wording is, therefore, considered to be about procedures for going forward rather than an actual sets out spatially of otherwise defined requirements for development, an appraisal of this ‘policy’ has not been undertaken. But in future iterations of this work, and should a more specific policy feature in the Cranbrook Plan in future drafts the need for an actual appraisal will be revisited.

### Ref 3.5.1 - Strategic Infrastructure – Energy – Land for District Heating Centre

- 8.84 The proposed policy advises of the appropriateness to Safeguard/Allocate land for the expansion of the district heating Energy Centre. In this context it should be noted that heating to houses in Cranbrook is currently provided through a District Heating System and this would offer scope for expansion. The supporting text to the proposed policy advises of the safeguarded/allocated land being located next to the existing plant.

#### Alternative Options

- 8.85 As an alternative to safeguarding or allocating land is the option of not safeguarding land - under this option the assumption is made that district heating would not extend to new development. It should be noted that assessment has not been undertaken of alternative site options for new plant or other means to supply the heating system.

#### Direct impacts

- 8.86 There are two significant direct positive impacts associated with the option of District heating, these are in respect of SA objectives 14) greenhouse gas emissions and 16) energy efficiency, though it is noted that these are specifically relevant only if the plant is working to maximum efficiency and using waste material or bio-mass as fuel. SA objective 17) for waste is identified as seeing a positive effect. The reducing greenhouse gas emissions consideration is particularly significant as the plan should produce heating with low net CO<sub>2</sub> emission levels. A minor possible negative impact is potentially identified in respect of landscape objectives. The plant could be physically quite large, hence potential for some landscape impacts, but it is set on the edge of an industrial landscape and next to the airport.
- 8.87 In respect of not making provision for the plant there are a series of question marks against corresponding SA objectives, as well as a range of neutral scores. The question marks reflect the uncertainty of impacts that an unspecified alternative source of heating might create or generate.

#### Secondary, cumulative and synergistic impacts

- 8.88 No specific secondary, cumulative and synergistic impacts are identified.

#### Permanence and Timescale of impacts

- 8.89 Provision should be seen as permanent, as should impacts, and it will be essential for heating capacity and outputs to be in place and operational in line with or ahead of houses and other forms of development being built.

#### Scope for Mitigation

- 8.90 There may be a need for care to be taken in design matters with respect for potential for adverse landscape impacts. Though there could perhaps be potential for a bold a striking design in a semi industrialised area.

Table 8.13 - SA appraisal of Safeguard/Allocate land for the expansion of the district heating Energy Centre

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
The proposed policy advises of the appropriateness to Safeguard/Allocate land for the expansion of the district heating Energy Centre.	0	0	0	0	0	0	0	0	-?	0	0	0	0	++	0	++	+	0	0	0
As an alternative to safeguarding or allocating land is the option of not safeguarding land - under this option the assumption is made that district heating would not extend to new development.	0	0	0	0	0	0	0	0	?	0	0	0	0	?	0	?	0	0	0	0

### **Ref 3.5.2 - Strategic Infrastructure – Energy - district heating throughout the development**

- 8.91 There is a policy reference to provision of district heating throughout the development and supporting text advises this is:

“To ensure that the expansion areas benefit district heating, it is necessary to set out the requirement for the infrastructure to be extended to allow future connections and also to ensure that future phases connect to the infrastructure that has been provided.”

- 8.92 This policy provision is essentially seen as an extension to the Ref 3.4.1 - safeguarding/allocating land for a new plant - and by default the matters appraised in respect of land safeguarding are also directly relevant to and the same as those for the safeguarding policy. Given the matters of repetition, in SA terms, specific appraisal of this policy approach is not undertaken.

### **Ref 3.6.1 - Strategic Infrastructure - Community Development - community infrastructure**

- 8.93 Policy provision advises a range of community infrastructure is required to support the delivery of the town including

- Allocation of land for a place of worship,
- Provision of emergency service facility
- Delivery of a compound suitable for street scene operations
- Provision serviced allotments
- Provision of an enhanced library facilities/service
- Provision and delivery of community shared transport schemes e.g. car clubs and hire bikes.

#### **Alternative Options**

- 8.94 It is taken as a given that there will be community infrastructure at Cranbrook and earlier stages of SA (and quite simply just sensible good plan making) establish the logic for provision. Given the in-principle importance of provision it is not considered that a policy of not providing is realistic and as such no alternative policy approach is assessed. However, through testing this policy as a standalone it provides scope to assess the importance of listed items and also highlight if any items are potentially not included but perhaps should have been.

#### **Direct impacts**

- 8.95 Two significant direct positive impacts are identified from the policy approach, SA objectives 2) Community Services and 12) sustainable transport. The policy is specifically about community services hence the significant positive against this objective; the observation is made, however, that the list of facilities is not perhaps as long as it could or should be and it is not clear if there are other

facilities that perhaps should also be included. It is considered as well that through policy development there could be scope for clarity over what, more precisely is seen as needed. SA objective 12) scores a significant positive as policy specifically refers to shared transport schemes e.g. car clubs and hire bikes. Positives are identified where facility provision have some likely positive causal link to desirable SA outcomes.

#### Secondary, cumulative and synergistic impacts

- 8.96 There can be expected to be wide ranging positive secondary impacts arising from good quality community infrastructure provision.

#### Permanence and Timescale of impacts

- 8.97 Positive impacts can be expected to be permanent.

#### Scope for Mitigation

- 8.98 Whilst mitigation is not identified as such (noting no negative impacts were identified) it would be appropriate to review items listed for provision and also to consider if there are community facilities that could help turn neutral impacts against some SA objectives in to positives.

Table 8.14 - SA appraisal of community infrastructure

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
<p>Policy provision advises a range of community infrastructure is required to support the delivery of the town including</p> <ul style="list-style-type: none"> <li>• Allocation of land for a place of worship,</li> <li>• Provision of emergency service facility</li> <li>• Delivery of a compound suitable for street scene operations</li> <li>• Provision serviced allotments</li> <li>• Provision of an enhanced library facilities/service</li> <li>• Provision and delivery of community shared transport schemes e.g. car clubs and hire bikes.</li> </ul>	0	++	+	+	+	0	+	0	0	0	0	++	0	0	0	0	0	0	0	0

### **Ref 3.7.1 - Strategic Infrastructure - Provision of on-site SANGS**

- 8.99 Policy advises of provision of on-site SANGS to mitigate the impact of development.
- 8.100 The options of on-site SANGs as opposed to provision elsewhere has already be considered earlier in this appraisal and the exercise of assessment is not replicated here. In summary it should be noted that on site provision scores more positively in sustainability terms.

### **Ref 4.1.1 – DM Policies – Movement and Transport – Travel plan**

- 8.101 There is a policy reference to development of, and adherence to a Travel Plan which should include the provision of a welcome pack and tablet; supporting text advises:

“Travel plans are recognised as a way of mitigating the negative transport impacts of development in order to promote sustainable development. The planning practice guidance considers that they are required for developments which generate significant amounts of movement. As part of the Healthy New Town designation by NHS England there is an opportunity to build a healthier place. This can be achieved by early and ongoing consideration of transport and means of travel by engaging with the community. In addition it has been recognised by Highways England that the Strategic road network will be at capacity as a result of this expansion and therefore it is important to seek more sustainable forms of travel to aide this capacity issue.”

- 8.102 This ‘policy’ provision is identified to be more about process matters, requiring a travel plan to accompany planning applications, rather than an actual policy approach to travel and transport issues. For this reason actual assessment and appraisal against alternatives is not seen as necessary, particularly noting that policies relating to differing travel options and alternatives are already appraised in this SA.



#### **Ref 4.1.2 - Development management - Movement and Transport – Electric Car Charging**

- 8.103 Policy provision advises that there should be electric car charging points for all residential dwellings and provision within public parking areas and within business car parks. For appraisal purposes it is assumed that people would use charging points and it would encourage use of electric cars.

##### Alternative Options

- 8.104 The alternative option is seen as not providing/not requiring dedicated charging points. The implication being that provision should be at the choice of the developer or consumer. For the benefit of the appraisal, and to allow one approach to be compared against another it is assumed that under this approach there would not be charging points.

##### Direct impacts

- 8.105 There are small number of direct positive impacts identified as associated with this policy approach, with an assumption that it would increase use of electric vehicles, especially cars and reduce use of petrol and diesel vehicles. It should be noted that in this assessment none of the positive impacts are identified as significant, but the positives are identified in respect of SA objectives 6) noise (electric cars are less noisy than internal combustion engines), 12) sustainable transport, 13) air soil and water quality (but air in particular given gaseous emissions that would otherwise arise), 14) greenhouse gas emissions and 16) energy efficiency. The option of not having/not promoting electric vehicle and instead assuming retained reliance on internal combustion engines, scores negatives against all these indicators.

##### Secondary, cumulative and synergistic impacts

- 8.106 There could be a range of secondary, cumulative and synergistic impacts that may arise as a consequence of this policy approach. If charging points encourage or allow people to become more mobile, specifically to travel more in electric vehicles than they might have done or do in internal combustion engine vehicles, there could be community benefits associated with people getting out more and also in potentially making for a cleaner environment there could be 'knock on' economic benefits for example, In respect of making Cranbrook a more attractive place to do business. Conversely, however, if charging points actually encourage people to drive more, and for example walk less, there could be adverse impacts, for example on health..

##### Permanence and Timescale of impacts

- 8.107 There is an expectation in a long term trend to electric car use so impacts should be seen as permanent.

##### Scope for Mitigation

- 8.108 Whilst implementation may typically have minor cost implications as these are not considered to be great there are no specific mitigation measures identified as needed.

Table 8.15 - SA appraisal of Electric Car Charging

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
There should be electric car charging points for all residential dwellings and provision within public parking areas and within business car parks.	0	0	0	0	0	+	0	0	0	0	0	+	+	+	0	+	0	0	0	0
The alternative option is seen as not providing/not requiring dedicated charging points (assumed for appraisal that there would not be provision).	0	0	0	0	0	-	0	0	0	0	0	-	-	-	0	-	0	0	0	0

### Ref 4.1.3 - Development management Policies - Movement and Transport – Cycle Parking

- 8.109 The proposed policy approach calls for provision of adequate secure cycle storage both in public areas and for dwellings without garaging. For reasons of appraisal the term “adequate” is taken to mean high levels of provision – essentially a situation where there is capacity for anyone wanting to park or lock up a bike in a safe, secure and convenient location to do so. However, in due course it would seem sensible for the policy wording to be explicit about what is actually meant by “adequate” which could be interpreted as a minimum standard rather than a higher amount aspirational standard. Also it is assumed that provision of good quality bike parking will encourage greater use of bikes and this is what is appraised; rather than just the principle of secure bike storage.

#### Alternative Options

- 8.110 The alternative that is appraised is to not provide limited or perhaps even nil provision for cycle parking.

#### Direct impacts

- 8.111 There are a number of direct positive impacts identified as associated with this policy approach, with an assumption that it would increase use of cycling and by implication reduce car use. In this assessment one SA objective 12) in respect of sustainable transport scores a significant positive impact. Positive impacts are identified in respect of SA objectives 4) health, 5) crime (this is actually on account of secure storage rather than use), 6) noise (bikes are less noisy than cars), 7) leisure and recreation, 13) air soil and water quality (but air in particular given gaseous emissions that would otherwise arise), 14) greenhouse gas emissions and 16) energy efficiency. The option of not promoting cycle use scores negatives against most of these indicators.

#### Secondary, cumulative and synergistic impacts

There could be a range of secondary, cumulative and synergistic impacts that may arise as a consequence of this policy approach. If cycle use becomes more widespread there could be community benefits associated with people getting out more and also in potentially making for a cleaner environment there could be ‘knock on’ economic benefits for example, In respect of making Cranbrook a more attractive place to do business. If people cycle more, however, there may be less passengers on public transport and any decline in patronage could impact on the financial viability of providing services and therefore there could be service decline.

#### Permanence and Timescale of impacts

- 8.112 Impacts can be permanent in nature.

#### Scope for Mitigation

- 8.113 It is not clear if policy should only apply in the case of dwellings to just dwellings that do not have a garage. Garages may not always be the most appropriate location for cycle parking.

Table 8.16 - SA appraisal of Cycle Parking

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
The proposed policy approach calls for provision of adequate secure cycle storage both in public areas and for dwellings without garaging	0	0	0	+	+	+	+	0	0	0	0	++	0	+	0	+	0	0	0	0
The alternative that is appraised is to not provide limited or perhaps even nil provision for cycle parking.	0	0	0	0	-	-	0	0	0	0	0	-	0	-	0	-	0	0	0	0

#### **Ref 4.1.4 - Development management Policies - Movement and Transport – New Fuel Station**

- 8.114 The policy approach advises of support the delivery of a fuel station at an appropriate location within the town. The implications being, and the basis on which assessment is undertaken, is an assumption that this will make it easier and more convenient for people to drive vehicles.

##### Alternative Options

- 8.115 The alternative is not providing a fuel station with the assumption, for SA purposes, of it not making it so easy or convenient to drive vehicles.

##### Direct impacts

- 8.116 Appraising the potential impacts of fuel station provision is a far from clear cut exercise. There could be an argument that if there is easy access to fuel then people will use their cars more and this could lead to some negatives. However and conversely a more pragmatic likelihood would appear to be that people will just fill up their vehicles elsewhere and actually could have greater adverse impacts in driving further to do so and not have a new provision could prejudice potential for promoting excellence in new fuel station provision, specifically including new fuel technologies.
- 8.117 Given the unknowns a number of question marks are highlighted in respect of impacts though with a positive for employment opportunities.

##### Secondary, cumulative and synergistic impacts

- 8.118 There are no specific secondary, cumulative and synergistic impacts noted.

##### Permanence and Timescale of impacts

- 8.119 The impacts of a new fuel station are taken as being permanent in nature.

##### Scope for Mitigation

- 8.120 It is seen as desirable for any fuel station to very clearly promote new technologies in fuel types and delivery. Also given that fuel stations, at their worst, can sometime be visually intrusive care of siting and design will be relevant concerns.

Table 8.17 - SA appraisal of new fuel station options

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
The policy approach advises of support the delivery of a fuel station at an appropriate location within the town.	0	0	0	0	0	0	0	0	0?	0?	0	-?	0	-?	0	0	0	+	0	0
The alternative is not providing a fuel station with the assumption, for SA purposes, of it not making it so easy or convenient to drive vehicles.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

#### **Ref 4.2.1 - Economy & Enterprise – Fibre Optic Broadband Ducting**

- 8.121 Policy provisions is made to secure sufficient ducting to provide fibre optic broadband connections to all premises and future proof development in this respect.

##### Alternative Options

- 8.122 The alternative option is identified of not providing appropriate ducting.

##### Direct impacts

- 8.123 A review against SA objectives, for ducting, shows positive likely impacts in respect of the three economy related SA objectives – 18) employment, 19) vitality and viability and 20) inward investment. In comparison not having ducting scores negatively against these.

##### Secondary, cumulative and synergistic impacts

- 8.124 A potential impact of having better broadband connections is that people will go out less and instead do business, entertainment, education and other aspects of life over the internet. This would arguably have 'knock-on' impacts in respect of the use and vitality of community facilities or health levels with people living sedentary life styles.

##### Permanence and Timescale of impacts

- 8.125 Installation of adequate capacity would need to be planned for at the outset and retro-fitting can be costly. Impacts may be permanent, but as technology moves on and with unknowns ahead, it maybe that in the future current approaches are not the best or most appropriate.

##### Scope for Mitigation

- 8.126 No specific mitigation measures are identified.

Table 8.18 - SA appraisal of Fibre Optic Broadband ducting

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy provisions is made to secure sufficient ducting to provide fibre optic broadband connections to all premises and future proof development in this respect.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+
The alternative option is identified of not providing appropriate ducting.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-	-



#### **Ref 4.2.2 - Economy & Enterprise – Delivery of Wi-Fi hotspots**

- 8.127 Policy provision is made through the siting of appropriately designed apparatus, facilitate the delivery of Wi-Fi hotspots and improved mobile phone coverage for the town.

##### Alternative Options

- 8.128 The alternative option is identified as not providing for Wi-Fi hotspots and accepting that there would not be the provision.

##### Direct impacts

- 8.129 A review against SA objectives shows positive likely impacts in respect of the three economy related SA objectives – 18) employment, 19) vitality and viability and 20) inward investment. In comparison not having WiFi hotspots scores negatively against these.

##### Secondary, cumulative and synergistic impacts

- 8.130 A potential impact of having better broadband connections is that people will go out less and instead do business, entertainment, education and other aspects of life over the internet. This would arguably have 'knock-on' impacts in respect of the use and vitality of community facilities or health levels with people living sedentary life styles.

##### Permanence and Timescale of impacts

- 8.131 Impacts may be permanent, but as technology moves on and with unknowns ahead, it maybe that in the future current approaches are not the best or most appropriate.

##### Scope for Mitigation

- 8.132 No specific mitigation measures are identified

Table 8.19 - SA appraisal of Delivery of Wi-Fi hotspots

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy provision is made through the siting of appropriately designed apparatus, facilitate the delivery of Wi-Fi hotspots and improved mobile phone coverage for the town.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+
The alternative option is identified as not providing for Wi-Fi hotspots and accepting negative impacts.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-	-

### Ref 4.2.3 - Economy & Enterprise – Business Space and Business Ladder

- 8.133 Policy provision provides for business space and the business ladder linked to flexible employment space & business support.

#### Alternative Options

- 8.134 The alternative option is identified of not providing the delivery of small serviced start up units.

#### Direct impacts

- 8.135 The key positive benefits are identified against the economy objectives and SA objectives and especially 18) employment and 19) town vitality and viability for which significant positive impacts are identified on account of the commercial opportunities that provision will provide for. In contrast not providing small spaces has negative economy impacts especially for SA objective 18) employment for which a significant negative impact is reported on account of the adverse employment impacts identified and lack of scope for people to be entrepreneurial and start up new businesses.

#### Secondary, cumulative and synergistic impacts

- 8.136 A vibrant local economy with lots of small business starting up can be expected to have wide ranging secondary, cumulative and synergistic impacts. Alongside businesses developing there can be expected to be extra consumers and people to use community services and some business might in their own right provide community services. Likewise new business may support education and training and be positive for health by providing gainful employment and opportunities for people to walk to work. New small business opportunities in the town should reduce the need to travel and therefore also have wider travel related benefits.

#### Permanence and Timescale of impacts

- 8.137 Encouraging and supporting new business growth, with the potential for smaller businesses to become bigger business, can be seen to have a permanence of impacts and also early start of business growth is important to install trends and patterns of Cranbrook being and becoming an entrepreneurial town.

#### Scope for Mitigation

- 8.138 With no specific negatives identified in respect of promoting small businesses there is no specific mitigation identified.

Table 8.20 - SA appraisal of Business Space and Business Ladder

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy provision provides for business space and the business ladder linked to flexible employment space & business support.	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	++	++	+
The alternative option is identified of not providing the delivery of small serviced start up units	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-	-

### Ref 4.3.1 - Green Infrastructure & Ecology – Open Space Provision

8.139 Policy provision is for provision of meaningful and well distributed open spaces.

#### Alternative Options

8.140 The identified alternative is to **not** provide for meaningful and well distributed open spaces – this could be to not have open spaces at all or to have open spaces in locations that people cannot readily access them.

#### Direct impacts

8.141 Provision of meaningful and accessible open space scores significant positive impacts against two SA objectives, 7) leisure and recreation and 10) amenity. Access to open space is of key importance for informal leisure activity and is also highly significant for overall amenity quality. The two significant positive outcomes are also complemented by a positive outcome in respect of SA Objective 4) for health. In contrast to the significant positives are corresponding significant negatives through not providing these open spaces.

#### Secondary, cumulative and synergistic impacts

8.142 There are a wide range of positive secondary, cumulative and synergistic impacts that can be expected to arise from provision of open space. By providing a focal point for human activity and interaction, especially if in substantial open spaces, it might be hoped that crime levels will be reduce and there will be space to 'escape' urban noise. Open space can provide a setting for heritage assets and also dovetail with wider landscape p[rotection objectives Open spaces can help protect ait, water and soil quality and by providing a physically attractive environments encourage investment and economic activity.

#### Permanence and Timescale of impacts

8.143 Positive impacts can be expected to be permanent in nature.

#### Scope for Mitigation

8.144 As no specific negatives are identified there is no explicit need for mitigation. However, as policy is developed and refined there will be the need to be far more specific about what is meant by "meaningful" and "well distributed".

Table 8.21 - SA appraisal of Open Space Provision

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy provision is for provision of meaningful and well distributed open spaces.	0	0	0	+	0	0	++	0	0	++	0	0	0	0	0	0	0	0	0	0
The identified alternative is to not provide for meaningful and well distributed open spaces	0	0	0	-	0	0	-	0	0	-	0	0	0	0	0	0	0	0	0	0

#### **Ref 4.3.2 - Green Infrastructure & Ecology – Landscape, Biodiversity and Drainage Strategy**

- 8.145 There is a policy reference to development of production of a Landscape, Biodiversity and Drainage Strategy (LBDS) for each of the four allocated development areas before the first determination of an application within that area; supporting text advises:

“The current LBDS has proved a useful tool in coordinating these components and seeking to ensure that a well-integrated strategy is provide for each sub phase. It is considered appropriate that this requirement is extended into the expansion phases which this policy would require. It is expected that within the new LBDS bird and bat boxes would be integrated into every dwelling (in accordance with new draft BS - Biodiversity and the built environment: Specification for the Design and Installation of Bird Boxes).”

- 8.146 This ‘policy’ provision is identified to be more about process matters, requiring an LBDS to accompany planning applications, rather than an actual policy approach to the issues. For this reason actual assessment and appraisal against alternatives is not seen as necessary, particularly noting that policies relating to landscape and biodiversity are already appraised through the plan. In due course refinement of policy on these subject matters can be expected, potentially as can policy for drainage. At later stages of plan making SA work can be seen as potentially necessary on such detailed policy work.

#### **Ref 4.4.1 - Design – Design Codes for Allocation Areas**

- 8.147 There is a policy reference to development of production of a design code for each of the four allocated development areas before the first determination of a detailed or Reserved Matters application within that area. This shall specifically set out how a range of housing typologies will be provided for which are appropriate to their local context and demonstrate how their role together with features including public square and spaces aides place making.; supporting text advises:

“Place making which an inherent and important strand of the NPPF and practice guidance requires the consideration of design at an early stage in the development process – this allows certainty for developers and aides the delivery of development. To fulfil the aims of the delivery of a Healthy New Town which is a sustainable vibrant and economically resilient community, a high quality design approach is required.

It is considered important that typologies are used as means of helping to shape future spaces and places and through this consideration a range of character areas can be achieved.”

- 8.148 This ‘policy’ provision is identified to be more about process matters, requiring a design code to accompany planning applications, rather than an actual policy approach to the issues. For this reason actual assessment and appraisal against alternatives is not seen as necessary. In due course refinement of policy on design issues might be incorporated into the plan and at that stage more detailed SA work, including in respect of specific details and alternative options may be appropriate.

#### Ref 4.4.2 - Design – Phasing Plans to Support Applications

- 8.149 There is a policy reference for a requirement for phasing plans to support applications for each of the four allocated areas; supporting text advises:

“It is important that development within each of the four areas is phased to deliver the houses in step with other vital infrastructure. Phasing plans will assist with achieving this.”

- 8.150 This ‘policy’ provision is identified to be more about process matters, requiring phasing plans to accompany planning applications, rather than an actual policy approach to the issues. For this reason actual assessment and appraisal against alternatives is not seen as necessary. In due course refinement of policy on phasing might be incorporated into the plan and at that stage more detailed SA work, including in respect of specific details and alternative options may be appropriate. In particular policy links between housing development alongside other services and facilities could be critical.

#### Ref 4.4.3 - Design – Building for Life 12

- 8.151 There is a policy reference for assessment of schemes against the criteria identified in Building for Life 12; supporting text advises:

*“Building for Life 12 and the criteria set out within the document represents a recognisable and clearly defined method for assessing development proposals that allow for certainty for all – developers, the Local Authority and interest community groups and individuals. The criteria represent a useful tool which is recognised as bringing benefits to the place making agenda which is necessary if Cranbrook is to fulfil its potential as a sustainable Healthy New Town.”*

- 8.152 This ‘policy’ provision is identified to be more about process matters, requiring phasing plans to accompany planning applications, rather than an actual policy approach to the issues. For this reason actual assessment and appraisal against alternatives is not seen as necessary. In due course refinement of policy on phasing might be incorporated into the plan and at that stage more detailed SA work, including in respect of specific details and alternative options may be appropriate. In particular policy links between housing development alongside other services and facilities could be critical.



#### **Ref 4.4.4 - Design – Adaptable Buildings and Spaces**

- 8.153 Policy provision is made in the plan for development of adaptable buildings and spaces that could be used for alternative uses.

##### **Alternative Options**

- 8.154 As an alternative to this approach an option of not building flexibility in to the design and construction of buildings could be applied.

##### **Direct impacts**

- 8.155 Direct positive benefits are particularly identified in respect of SA objectives 18) employment and 19) vitality and viability. A policy allowing for flexibility will provide scope for new businesses to set up in spaces created without necessarily having the complexity of long term ties or commitments. These same flexibility considerations also apply to community services SA Objective 2). In contrast, however, negatives apply to the same SA objectives in the absence of such flexible spaces.

##### **Secondary, cumulative and synergistic impacts**

There is also scope for positive secondary and cumulative impacts from the policy approach. These could come about through other uses, such as health care facilities, occupying temporary spaces. More widely, however, temporary spaces have the potential to rapidly bring life and activity it to what could otherwise be underused or potentially negatively used spaces. Use of such spaces could have wider 'knock-on' positive benefits.

##### **Permanence and Timescale of impacts**

- 8.156 Whilst temporary uses can become longer term or permanent there is a distinct and very real temporary and flexible nature to policy. So what may start of a temporary activity in one use for one period of time, by design could be a different use at a spate time.

##### **Scope for Mitigation**

- 8.157 As no negatives in respect of temporary space are identified there is no specific mitigation identified.

**Table 8.22 - SA appraisal of Adaptable Buildings and Spaces**

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy provision is made in the plan for development of adaptable buildings and spaces that could be used for alternative uses.	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0
As an alternative to this approach an option of not building flexibility in to the design and construction of buildings could be applied.	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-	0

#### **Ref 4.4.5 - Design – Refuse Storage Facilities**

- 8.158 Policy provision is made for provision of refuse storage facilities that meet the needs of the household.

##### **Alternative Options**

- 8.159 As an alternative would be the option of not providing refuse storage facilities.

##### **Direct impacts**

- 8.160 Two positive benefits tested against SA Objectives are identified in respect of proposed policy 4) health and 10) amenity. Provision of space for storage facilities can be expected to have positive outcomes when tested against these considerations but lack of provision can be expected to have adverse impacts hence the negative scores.

##### **Secondary, cumulative and synergistic impacts**

- 8.161 There are no specific secondary, cumulative and synergistic impacts noted but overall having waste stored away could be expected to potentially have wider positive impacts.

##### **Permanence and Timescale of impacts**

- 8.162 Positive impacts can be expected to be permanent, albeit if waste collection and disposal regimes change in the future then spaces created could cease to be fit for purpose..

##### **Scope for Mitigation**

- 8.163 Flexibility in respect of space created could be built into designs for spaces.

Table 8.23 - SA appraisal of Refuse Storage Facilities

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy provision is made for provision of refuse storage facilities that meet the needs of the household.	0	0	0	+	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0
As an alternative would be the option of not providing refuse storage facilities.	0	0	0	-	0	0	0	0	0	-	0	0	0	0	0	0	0	0	0	0

#### **Ref 4.4.6 - Design – Minimum parking space sizes**

8.164 Policy provision is made for minimum parking space sizes.

##### **Alternative Options**

8.165 The alternative option is identified as not providing minimum standards.

##### **Direct impacts**

8.166 A positive amenity impact, SA Objective 10) is identified in respect of this policy along with a negative impact for not implementing it.

##### **Secondary, cumulative and synergistic impacts**

8.167 There could be some secondary, cumulative and synergistic impacts as a consequence of this policy and although perhaps not great they potential could include reductions in car crime, landscape quality improvements, get cars off roads, and more generally just less road congestion and on-road parking leading to a nicer environment. However, the caveat is made that badly designed and located parking areas can be unsightly so care over implementation and development will be required.

##### **Permanence and Timescale of impacts**

8.168 Impacts could be expected to be permanent.

##### **Scope for Mitigation**

8.169 Noting the need for careful development no other mitigation is seen as necessary.

Table 8.24 - SA appraisal of Minimum parking space sizes

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy provision is made for minimum parking space sizes.	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0
The alternative option is identified as not providing minimum standards.	0	0	0	0	0	0	0	0	0	-	0	0	0	0	0	0	0	0	0	0

## 9 Monitoring

- 9.1 The SEA Regulations requires that *“The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action” (Regulation 17) and that the environmental report should provide information on “a description of the measures envisaged concerning monitoring” (Schedule 2).* Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.
- 9.2 The Government guidance on SA states that it is not necessary to monitor everything. Instead, monitoring should be focussed on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. Due to the early stage of the Cranbrook Plan preparation process, the monitoring measures proposed in this initial SA Report relate to all of the SA objectives; however later in the SA process it should be possible to focus more specifically on the predicted significant effects only.
- 9.3 As previously discussed a number of the Cranbrook Plan options could have potential significant effects (both positive and negative) on the SA objectives. Therefore, it is recommended that monitoring is undertaken of the plan itself to determine whether these effects do indeed occur due to implementation of the Cranbrook Plan, and in order to seek to remedy or reverse them.

### Suggested indicators for monitoring the sustainability effects of the Cranbrook Plan

- 9.4 **Table 9.1** presents suggested indicators for monitoring the potential significant sustainability effects of implementing the Cranbrook Plan. Note that the indicators proposed are included as suggestions, and are drawn from the indicators proposed in the SA Report for the East Devon Local Plan, reflecting the indicators proposed within the monitoring framework for the Local Plan itself.
- 9.5 In addition, the data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations (e.g. the Environment Agency) can also be used as a source of indicators. It will therefore be appropriate to continue the dialogue with statutory environmental consultees and other stakeholders commenced as part of the SA process and plan preparation, and work with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

**Table 9.1: Suggested indicators for monitoring the sustainability effects of the Cranbrook Plan**

SA objectives for which potential significant effects have been identified	Suggested indicators
1. To ensure everybody has the opportunity to live in a decent home.	<ul style="list-style-type: none"> <li>Number of new homes built annually within the town.</li> <li>Percentage of all new homes delivered in the town that are affordable.</li> </ul>
2. To ensure that all groups of the population have access to community services.	<ul style="list-style-type: none"> <li>Amount of community services delivered within Cranbrook including GP and school places.</li> </ul>
3. To provide for education, skills and lifelong learning to: <ul style="list-style-type: none"> <li>i. meet the needs of the local population, and</li> <li>ii. meet local employment needs.</li> </ul>	<ul style="list-style-type: none"> <li>Number of new work-based apprenticeships offered in the town annually.</li> <li>Number of new school places created in the town annually.</li> </ul>
4. To improve the population's health.	<ul style="list-style-type: none"> <li>Levels of walking and cycling for commuting to and from Cranbrook.</li> </ul>
5. To reduce crime and fear of crime.	<ul style="list-style-type: none"> <li>Number of crimes reported annually in the town.</li> </ul>
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	<ul style="list-style-type: none"> <li>Number of noise pollution incidents reports annually in Cranbrook.</li> </ul>
7. To maintain and improve cultural, social and leisure provision.	<ul style="list-style-type: none"> <li>Percentage of eligible open spaces managed to green flag award standard.</li> </ul>
8. To maintain and enhance built and historic assets.	<ul style="list-style-type: none"> <li>Number of heritage assets within proximity of Cranbrook on the 'Heritage at Risk Register'.</li> </ul>
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	<ul style="list-style-type: none"> <li>Percentage of new development taking place on high quality agricultural land.</li> </ul>
10. To maintain the local amenity, quality and character of the local environment.	<ul style="list-style-type: none"> <li>Number of complaints made to EDDC regarding noise pollution in Cranbrook.</li> </ul>
11. To conserve and enhance the biodiversity of East Devon.	<ul style="list-style-type: none"> <li>Change in areas and populations of biodiversity importance, including (i) change in priority habitats and species (by type); and (ii) change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional significance (changes arising from development, management and planning agreements, in hectares and numbers of priority species type).</li> <li>Amount of SANGs delivered.</li> </ul>
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	<ul style="list-style-type: none"> <li>Frequency of bus services in the town.</li> <li>Frequency of rail services in the town.</li> <li>Levels of bus and rail patronage.</li> </ul>
13. To maintain and enhance the environment in terms of air, soil and water quality.	<ul style="list-style-type: none"> <li>Number of declared Air Quality Management Areas (AQMAs) in the town.</li> </ul>
14. To contribute towards a reduction in local emissions of greenhouse gases.	<ul style="list-style-type: none"> <li>Renewable energy capacity installed by type.</li> </ul>



SA objectives for which potential significant effects have been identified	Suggested indicators
15. To ensure that there is no increase in the risk of flooding.	<ul style="list-style-type: none"> <li>• Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.</li> </ul>
16. To ensure energy consumption is as efficient as possible.	<ul style="list-style-type: none"> <li>• Renewable energy capacity installed by type.</li> </ul>
17. To promote wise use of waste resources whilst reducing waste production and disposal.	<ul style="list-style-type: none"> <li>• Volume of waste generated in the town annually.</li> <li>• Percentage of waste generated in the town that is recycled.</li> </ul>
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	<ul style="list-style-type: none"> <li>• Amount of land (defined by completed sqm gross floorspace) developed for employment by type.</li> </ul>
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	<ul style="list-style-type: none"> <li>• Amount of completed retail development in the town centre.</li> </ul>
20. To encourage and accommodate both indigenous and inward investment.	<ul style="list-style-type: none"> <li>• Amount of land (defined by completed SqM gross floorspace) developed for employment by type.</li> </ul>

## 10 Conclusions and Next Steps

- 10.1 The SA work at this Masterplan stage of plan making has taken a systematic approach to appraising the emerging Cranbrook Plan. Whilst production of this SA has revisited the earlier assessment at Issues and Options stage of plan making, and indeed drawn on that work, it has also allowed for a fundamental review of new and emerging work.
- 10.2 This SA work has ensured, in respect of Masterplan considerations, that different reasonable alternative options and approaches have been assessed in order to inform future development and policy making for Cranbrook. The SA establishes a soundness of approach of the masterplan for Cranbrook.

### Next steps

- 10.3 The SA Report will be made available alongside the draft of the Cranbrook Plan during the consultation period. Comments will be invited on the SA and those received, alongside comments received on the Cranbrook Masterplan, will be taken into account in production of the Publication draft of the Cranbrook Plan and the SA of that Plan. This future work will take place in 2018.

## Appendix 1 Initial (Regulation 18) Cranbrook Plan consultation

The June 2015 consultation stated that the Cranbrook Plan might do the following:

- Allocate specific sites and land areas for new development.
- Designate land for 'protection' or safeguarding which will prevent or 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.
- Determine whether planning applications submitted to the Council should be granted planning permission and what conditions might apply.

There were comments received from 24 respondents on this initial consultation. These can be viewed at:

<http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/comments-on-initial-cranbrook-plan-dpd-consultation>

Whilst comments covered a very broad range of issues, including many of relevance to issues and principle relating to sustainable development the only comment explicitly about the formal processes of Sustainability Appraisal and/or Strategic Environmental assessment was from:

The Environment Agency – who advised – *“Whilst we appreciate that the plan will likely be subject to a Sustainability Appraisal it would be good to see how the environment will be considered by the plan beyond simple mitigation and/or public green space.”*

This comment is noted and this report is part of the overall Sustainability appraisal of the Cranbrook Plan.

## **Appendix 2   Scoping letter and consultation comments**

At the start of the SA process LUC, acting for East Devon District Council, sent out a scoping report letter seeking comments. The text of the letter is reproduced below and a summary of responses received are tabled after the letter.



Environmental Planning  
Design & Management

Our reference: 6596  
Date: 24/09/15

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 guidance<sup>1</sup>, 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.

<sup>1</sup> <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 below<sup>2</sup>:
  - Allocate specific sites and land areas for new development;
  - designate land for 'protection' or safeguarding which will prevent or 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.

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<sup>2</sup> <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 Regulations<sup>3</sup> and Habitat Regulations<sup>4</sup>, 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 Strategy<sup>5</sup> (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.

<sup>3</sup> The Environmental Assessment of Plans and Programmes Regulations 2004.

<sup>4</sup> The Conservation of Habitats and Species Regulations 2010.

<sup>5</sup> 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 Strategy<sup>6</sup>, 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 Assessment<sup>7</sup>. 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.

<sup>6</sup> South-east Devon European Site Mitigation Strategy. Footprint Ecology. June 2014.

<sup>7</sup> 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 30<sup>th</sup> October 2015 to myself, either at the address at the top of this letter or via e mail to the address below.

Yours sincerely,

Kate Nicholls  
Principal Environmental Planner  
LUC  
kate.nicholls@landuse.co.uk

**Table A1.1: Consultation responses received in relation to September 2015 Scoping letter**

Consultee	Response	LUCs response
<b>Honiton Town Council</b>	Your letter was reviewed by the Town Council's Planning Committee on 6th October. The Town Council wishes to thank you for consulting and to advise that it has no comments to make.	Noted, no action required.
<b>Marine Management Organisation</b>	I have reviewed the document sent and have no comment on behalf of the MMO. Predominantly, the MMO are concerned with works carried out below Mean High Water Springs and as such this scoping letter is rather outside of our remit as far as I can see.	Noted, no action required.
<b>National Trust</b>	Paragraph 16 of the SEA Scoping letter states that there are no biodiversity sites within very close proximity of Cranbrook. However, Hellings Park Fen just north of the railway line at Wishford Farm, on the Killerton estate, is a County Wildlife Site as designated by the Devon Wildlife Trust. Further away the park and woods north of Killerton House are designated SSSI for their geology. Ashclyst Forest, although not designated an SSSI, is also of national importance for its lichens and the number of veteran trees it includes (the forest also supports an important population of pearl-bordered fritillary butterfly, a greatly declined UK Biodiversity Action Plan Priority Species and is important for bats). Ashclyst Forest is also a County Wildlife site.	Noted. The baseline information has been expanded to refer to these locally designated biodiversity sites (see <b>Chapter 3</b> ).
<b>National Trust</b>	Paragraph 19 of the SEA Scoping letter identifies the Killerton Registered park and garden. However, the baseline information needs to be corrected in terms of the status of the heritage assets concerned, as identified in the <i>Background</i> section above; specifically that the park and garden is in fact grade II*, not grade II. The Conservation Area at Broadclyst should also be mentioned. Reference should be made to the <i>Killerton Setting Study</i> produced by Land Use Consultants in 2013. The Killerton setting study locates Cranbrook principally within a sub-area of the <i>Lowland Plains</i> landscape character type, <i>character area 6c</i> , which forms the middle to distant setting to the southern part of Killerton Park, featuring in key views from Killerton Garden. The study recognises this area to only be of low significance to the Park and currently subject to the greatest degree of change of all the areas covered by the study. However, whilst the area is of low	Noted. The reference to Killerton in the baseline information has been corrected and reference to the Conservation Area at Broadclyst has been added. The need to consider the findings of the Killerton Setting Study is also referred to in the updated baseline information (see Chapter 3).

Consultee	Response	LUCs response
	<p>significance to Killerton Park it should still be noted that the DPD area falls within the defined ‘<i>Zone of Potential Influence</i>’, and the setting study should form part of the evidence base of the DPD and a proportionate assessment of impact be made in relation to potential development. National policy in relation to ‘plan-making’ is clear that “Local planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to the environment.” (NPPF; para 169)</p>	
<p><b>National Trust</b></p>	<p><b>Key Environmental and Sustainability Issues</b></p> <p>Specific mention should be made of the Clyst Valley Regional Park proposal. The Trust strongly supports Green Infrastructure (GI) forming an integral part of the vision for sustainable growth in the Exeter and East Devon Growth Point area. The <i>Killerton Estate and Ashclyst Forest</i> ‘Strategic Project’ identified in the Green Infrastructure Strategy Phase 2 for the Exeter Area and East Devon New Growth Point (2009; Pages 12 and 15), plans for the “<i>enhancement of Killerton Estate and Ashclyst Forest as a key recreation and leisure asset and valuable wildlife habitat</i>” with the new community at Cranbrook being encouraged to “<i>make full use of the enhanced leisure and recreational facilities at the Forest</i>” (page 22).</p> <p>The New East Devon Local Plan Strategy 10 for East Devon’s West End promotes the Clyst Valley Regional Park (CVRP) as a Green Infrastructure initiative that will provide high quality natural green space, and makes clear that developer contributions will be used to help deliver this ‘landscape’ scale strategic project (Strategy 10 – Green Infrastructure in East Devon’s West End). At the Examination of the East Devon Local Plan the Council indicated that the CVRP could potentially function as a Suitable Alternative Natural Green Space (SANGS) to mitigate the recreational impact of additional visitors on the protected European wildlife sites of the East Devon Pebblebed Heaths and the Exe Estuary.</p> <p>The Trust has recently produced <i>A Prospectus for Action; Opportunities arising from the Exeter and East Devon Growth Point</i>, prepared by Land Use Consultants (August 2015), which has already been submitted to the Council to form part of the evidence</p>	<p>Noted. Information has been added to the baseline information in relation to Clyst Valley Regional Park (see Chapter 3).</p>

Consultee	Response	LUCs response
	<p>base for the Local Plan and specifically the Cranbrook DPD (copy attached). This highlights the need for a <i>Growth Point Green Infrastructure Masterplan</i>. The Cranbrook DPD should tie in with such a Green Infrastructure Masterplan, and specifically the planning for, and delivery of, the Clyst Valley Regional Park. The Trust has also commissioned a SANGs assessment for Killerton from Footprint Ecology, which is forthcoming.</p>	
<p><b>National Trust</b></p>	<p>Under the first bullet, of paragraph 21 of the letter, the impact of the development of Cranbrook on the wider road network, particularly north of the rail line, needs to be considered as an issue. Already we are seeing an increase in traffic along narrow Devon lanes and inevitably 18-20,000 new residents with their cars is going to bring about significant change, impacting the character of the current rural landscape. Would this increased movement activity be deemed to “<i>respect and enhance</i>” local character? And if not, consideration needs to be given to the steps necessary to mitigate this impact.</p> <p>The third bullet should also cover any likely impact, from the expansion of Cranbrook, on the flood plain of the strategic watercourses within the study area, particularly in relation to Trust land.</p> <p>The fourth bullet should specifically mention parks and gardens, given the Killerton setting study mentioned above.</p> <p>Finally, there is the issue of the new railway station only currently being proposed to have access from one side of the track, with no pedestrian or cycle crossing currently proposed at Cranbrook station. This would not be taking the opportunity to maximise its potential contribution to SA objectives, specifically SA objective 12, by not helping encouraging use of non-car based modes of transport by local communities north of the rail line. This needs to be considered as an issue.</p>	<p>Noted. An additional key sustainability issue has been added (see Table 3.1) in relation to the need to consider the impacts of development on the transport network.</p> <p>The key sustainability issue relating to flood risk has been amended to make reference to the need to consider the impacts of development at Cranbrook on strategic watercourses (see Table 3.1).</p> <p>The key sustainability issue relating to conservation and enhancement of heritage assets has been amended to make reference to the need to consider the impacts of development at Cranbrook on Killerton Park and Garden (see Table 3.1).</p> <p>As noted earlier in this table, an additional key sustainability issue has been added in relation to the potential for development at Cranbrook to impact upon the local transport network (see Table 3.1). The impacts of proposals in the Cranbrook Plan on levels of sustainable</p>



Consultee	Response	LUCs response
		transport use will be considered through the appraisal of options against SA objective 12: To promote and encourage non-car based modes of transport and reduce journey lengths.
<b>National Trust</b>	<p><b>SA Objectives</b></p> <p>A Sustainability Appraisal objective should specifically relate to Cranbrook being developed within the context of ‘landscape scale’ strategic infrastructure projects, and directly contributing to their delivery.</p> <p>SA objective 8 should make reference to heritage assets <i>and their setting</i>.</p>	Noted. SA objective 8 has been amended to refer to impacts on the setting of heritage assets.
<b>Natural England</b>	<p>Our comments relate to the following:</p> <ul style="list-style-type: none"> <li>• <b>The scope of the Cranbrook Plan SA/SEA</b></li> <li>• <b>The HRA of the Cranbrook Plan</b></li> </ul> <p><b>Scope of the Cranbrook Plan SA/SEA</b></p> <p>Your scoping letter refers to the relatively narrow scope of the Cranbrook Plan within the context of the East Devon Local Plan. We acknowledge that the Cranbrook Plan does not allocate development in excess of the Local Plan allocation at Cranbrook and that the SA/SEA of the Cranbrook Plan can draw on the SA/SEA of the overarching Local Plan. The proposed approach to the Cranbrook Plan’s SA/SEA, as set out in the Scoping Letter, will meet the SA/SEA requirements in terms of methodology, relevant policy context, baseline information, key environmental and sustainability issues and SA Framework.</p> <p><b>The HRA of the Cranbrook Plan</b></p> <p>We agree with your assertion that, as the Cranbrook Plan allocations remain within the Local Plan allocations, the conclusions of the Local Plan’s HRA can apply to the Cranbrook Plan. We acknowledge that additional work was undertaken on the HRA and the wording of the Local Plan, to address our concerns as set out in our earlier HRA consultation response dated 11 June 2015. We also acknowledge that the</p>	Noted, no action required.



Consultee	Response	LUCs response
	revised versions of the Local Plan and the HRA were submitted for Examination as shown on the EDDC website. We are satisfied that the Local Plan as it currently stands accords with the Habitats Regulations, and that a separate HRA of the Cranbrook Plan is not necessary. If any significant changes to the Local Plan are made however, this position will need to be reviewed.	
<b>Environment Agency</b>	We are satisfied with the proposed scope of the SEA. The contents of the scoping letter and the SEA framework recognise most of the key environmental issues of relevance to us like ensuring no increase in flood risk, the maintenance and enhancement of water quality, the conservation and enhancement of biodiversity and the waste management. Nonetheless we would recommend that the SEA makes specific reference to the objectives of the Water Framework Directive and includes priority habitats and species when considering biodiversity impacts.	Noted. The Water Framework Directive is now referred to in the review of plans, policies and programmes (see review in <b>Chapter 3</b> ). Options for the Cranbrook Plan will be appraised against SA objective 11 which considers impacts on biodiversity, including priority habitats and species.
<b>David Lock Associates</b>	<p><b>SA Scoping</b></p> <p>It is agreed that the Cranbrook Plan DPD, and the SA process related to it, has a narrow scope. This arises in part as the DPD and its SA is prepared in the context of an overarching Sustainability Appraisal for the East Devon New Local Plan. Equally, in the formulation of options, the scope is narrowly defined by the East Devon Local Plan which is now at an advanced stage and which explicitly provides for the further expansion/intensification of Cranbrook to accommodate the additional houses and other related facilities proposed in the Cranbrook Plan Area, outside the designated Neighbourhood Plan Areas of Rockbeare, Broadclyst and Clyst Honiton.</p> <p><b>Baseline Information</b></p> <p>Your Scoping letter sets out some of the sources of such information and summarises some of that information. The baseline information should also make reference and draw from the application material that supports the present applications for the expansion of Cranbrook (15/00045-47/OUT).</p> <p><b>Key Environmental and Sustainability Issues</b></p>	Noted. The baseline information has been amended to include details of the proposed expansion of Cranbrook (see <b>Chapter 3</b> ). It is recognised that options in the Cranbrook Plan may offer opportunities for landscape enhancement as well as the mitigation of negative impacts and this will be addressed in the SA as appropriate. The SA framework includes objectives relating to housing, employment and services and facilities, against which options for the Cranbrook Plan are being assessed, and consideration is being given to the need to achieve a balance between the provision of housing and supporting infrastructure.

Consultee	Response	LUCs response
	<p>It is agreed that many of the key sustainability issues will be the same as the rest of the District.</p> <p>As to those issues set out in your letter I would make the following comment:</p> <ul style="list-style-type: none"> <li>the reference to the need to ensure that large scale new development being appropriate and integrated into the landscape and respecting character should be expanded to include consideration of the opportunities for landscape enhancements – including significant new planting. It should also recognise that landscape impacts of development can be positive.</li> <li>the reference to biodiversity appears to be inconsistent with that in paragraph 10 of the Scoping letter. It is agreed that para 10 is the appropriate approach.</li> <li>considerable care is needed in considering the issue of the conservation of the setting of the listed buildings at such a high level. The design of Cranbrook to date has shown that the setting of listed buildings has been appropriately and satisfactorily addressed through the detailed design process.</li> </ul> <p>Considerable care also needs to be exercised in considering an issue of balancing residential opportunities with employment and services and facilities. As was set out in our representations on the scope of the DPD, such issues must be considered on the basis of the fundamental planning philosophy of Cranbrook - in particular the close synergistic relationships between Cranbrook, Skypark, the Airport and other developments - and not as a standalone development.</p> <p>NB: Nick sent additional email containing previous scoping comments</p>	
David Lock Associates	<p><b>Assessment methodology for the Cranbrook Plan</b></p> <p>There are, however, a number of important points that the SA/SEA must take into account in assessing options against the environmental and sustainability objectives set out in the methodology.</p> <p>First the assessment can only be at a high level. Hence the conclusions drawn at that level must not prejudge the opportunity to draw conclusions based on more detailed designs at a later stage of the master plan process or more detailed technical work being conducted as part of the DPD and/or application process. For</p>	<p>Noted. It is inevitable that some of the impacts of development cannot be determined at this level of assessment and where appropriate the SA will refer to effects being uncertain depending on factors such as the detailed design of development that eventually comes forward. It will also be recognised that high quality design can have positive effects on the landscape and</p>

Consultee	Response	LUCs response
	<p>instance drawing conclusions on the setting of listed buildings is likely to be inappropriate given the level of assessment and information available to the SA. Such judgements can only be formed with more certainty on the basis of more detailed assessments and design.</p> <p>Second recognition should be given to the opportunity through further design development to deliver substantial positive outcomes and/or to mitigate the impacts of development. Outcomes at this SA stage should not prejudice that more detailed design process. For instance there is substantial potential through design to deliver landscape enhancements. The positive opportunities arising from development (including at later design stages) should be fully reflected in the assessment and also the positive opportunities for mitigation.</p> <p>With regard to the consideration of options, the SA for the Plan should not seek to prejudice outcomes or options being considered through other means. One such example would be the consideration in relation to gypsy and traveller provision that are to be considered in the District Wide Gypsy and Traveller DPD.</p>	<p>built environment, as well as mitigating potential negative effects.</p>
<b>Network Rail</b>	<p>In relation to the issues contained in your letter, NR's is primarily concerned with the provision of an effective and sustainable public transport system. This is compatible with the objective of avoiding high levels of car use by promoting and encouraging non-car based modes of transport. NR therefore welcome the inclusion of this objective.</p> <p>In relation to the "Key Environment and Sustainable Issues" listed in the scoping letter, NR are of the view that in addition to ensuring that new large-scale development is appropriately integrated into the landscape and, where possible, respecting and enhancing local character, the scoping of the EA should also ensure that new development is integrated in such way that it does not compromise or disrupt the provision of existing sustainable services. For example NR have already made a representation to the Draft Cranbrook DPD that any new development that may increase traffic at a nearby level crossing sited to the east of the settlement</p>	<p>Noted. As already described in this table above, an additional key sustainability issue relating to the need to consider the impacts of new development on the transport network has been included (see <b>Table 3.1</b> of this report).</p>

Consultee	Response	LUCs response
	<p>would not only have implications for safety at the level crossing but, as a result of increased patronage, may force NR to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using the crossing. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. Clearly, such a negative impact on rail services resulting from new development that is poorly integrated would be contrary to other key environmental and sustainable issues listed in the scoping letter such as the need to avoid high levels of car use. It would also be contrary to “SA Objective 12” which seeks to promote and encourage non-car based modes of transport.</p>	
<p><b>Paul Smith</b></p>	<p>The protection of environment and habitat, is clearly one of the central issues surrounding the ongoing development of Cranbrook, and subject to both UK and EU directive. However it will be necessary for the exercise of a fine balance of conflicting interest to ensure a sustainability of development incorporating adequate infrastructure to maximise the well - being and healthy life style of all residents.</p> <p>In addition to Town based recreational facilities, Cranbrook must be considered in the context of its connectivity to surrounding parishes, and policies adopted which encourage a healthy life style. Amongst other infrastructure this will entail provision of safe cycle/walking routes throughout, usable by all communities, providing improved access to countryside facility but also communication.</p> <p>Whilst faced with an ever diminishing budget, I note that since 2013 Local Authorities have been made responsible for public health issues as part of health and social care reforms. I note that Cranbrook has the potential to be selected as a ‘healthy lifestyle Town’ following comments made by Simon Stephens head of NHS England. I am unclear as to the potential for funding benefits, but It will be imperative that EDDC works closely with all partners if this proposal is to be realised to optimum benefit.</p> <p>Finally, whilst the arrival of a rail service and improving bus services will ensure swifter and more flexible travel, it is clear that whilst daily usage maybe reduced,</p>	<p>Noted. The likely effects of proposals in the Cranbrook Plan on health and sustainable transport are being assessed through the appraisal of options against SA objectives 4: health and 12: sustainable transport.</p>

Consultee	Response	LUCs response
	<p>rural residents will not part with their vehicular transport because of the complete freedom of movement it enables. Many residents of Cranbrook and surrounding area travel to employment considerably further afield than Exeter. It is therefore essential that this reality continues to be acknowledged by planners and informs decisions re parking provision both on and off road. Inadequate parking and road widths were acknowledged at phase 1 of Cranbrook, however these issues have to a larger extent been addressed during the building of phase 2. This ongoing consideration should prevail during further build out of the Town.</p>	
<p><b>Equality and Human Rights Commission</b></p>	<p>Please be advised that the Commission receives many notices and requests to comment on planning issues. We do not have the resources to respond to all, and it is not our practice to respond to consultations on local planning projects. As you may be aware, Local Planning Authorities and other public authorities, in the planning process are subject to the Public Sector Equality Duty (PSED) and are usually better placed than the Commission is to understand the context of planning projects. Therefore, we would request you do not send us further information on this project, unless there is a clear and specific equality and human rights concern you wish to raise (for example, impact on minority communities such as BME groups, or on accessibility for disabled people) where we may be able to add value or if you are uncertain about how the PSED may apply in the decision-making process. As the regulator for the PSED, we may be able to assist.</p>	<p>Noted, no action required.</p>
<p><b>South West Water</b></p>	<p>Kate regarding Cranbrook South West Water has no concerns with regard to the phases currently under construction/with the benefit of planning permission. We have already been consulted by East Devon District Council regarding the 3 further expansion areas and again have no concerns in respect of our interests.</p>	<p>Noted, no action required.</p>

## Appendix 3 Assessment of Existing Net Residential Densities at Cranbrook - Summer 2017

An assessment has been undertaken of net residential density levels of dwellings built and registered for Council tax paying purposes at Cranbrook. The work was undertaken in the summer of 2017 and involved defining net developed areas on a map and recording the Council Tax banded dwellings that fall in the defined areas.

The map of the following page shows the identified areas that were recorded and interrogated. Most of the recorded areas shown in red have been fully built-out and it was comparatively straight forward to define boundaries around them. In some case, notably areas 8 and 9, there was adjoining ongoing development and a best case fit was used to define the red line to encompass contained areas of completed development (measured by council Tax banded properties). The areas shown are for the most part of a similar size range to the proposed housing development areas (the brown coloured in areas) on the Cranbrook Masterplan.

It is stressed that the map over the page shows an interpretation of **net development areas**. For this work net area were defined as encompassing:

- houses and gardens;
- car parking courts
- estate roads and footpaths;
- incidental open space – including small play spaces and other local green spaces.

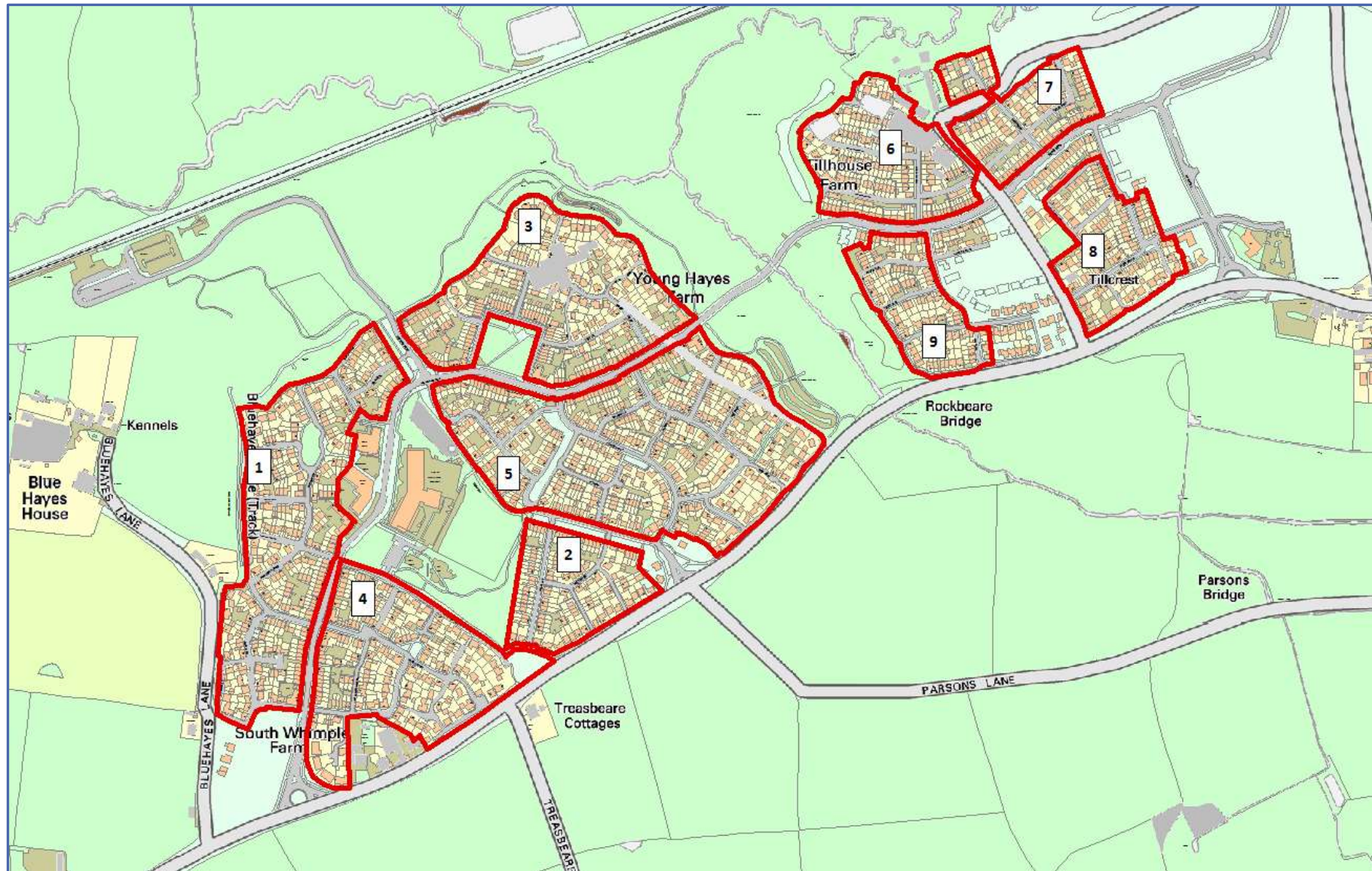
The net areas exclude larger scale, strategic and non-residential features such as strategic highways and access roads, major landscaping areas and parkland, playing fields, schools, community and businesses uses and larger scale play areas.

The table below shows the area by reference number, their sizes, housing numbers in them and net density. The recorded net density levels for existing development at Cranbrook ranged from 35.4 dwellings to the hectare to 48.2 with an average level of 42.3.

Area Number	Area Size – in Hectares	Number of Council Tax Banded Homes	Density – Homes/Hectare
1	5.58	245	43.91
2	2.04	96	47.06
3	4.79	203	42.38
4	4.32	153	35.42
5	7.97	332	41.66
6	2.80	135	48.21
7	1.94	86	44.33
8	2.20	84	38.18
9	1.80	79	43.89
<b>Total</b>	<b>33.44</b>	<b>1,413</b>	<b>42.25</b>



### Plan of Cranbrook Showing Areas Assessed to Calculate Net Density Levels



## **Sustainability Appraisal of the Cranbrook Plan**

**Document Prepared By:**  
**Planning Policy Section – East Devon District Council**