

# Non-Technical Summary of the: Sustainability Appraisal of the Cranbrook Plan - Publication Draft



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# Contents

<b>1</b>	<b>Introduction to the Cranbrook Plan and Sustainability Appraisal</b>	<b>4</b>
<b>2</b>	<b>Methodology and Approach to the Sustainability Appraisal</b>	<b>6</b>
<b>3</b>	<b>Sustainability Appraisal of the Publication Cranbrook Plan</b>	<b>16</b>
<b>4</b>	<b>Monitoring</b>	<b>26</b>
<b>5</b>	<b>Conclusions</b>	<b>28</b>

# 1 Introduction to the Cranbrook Plan and Sustainability Appraisal

## Introduction

- 1.1 The Cranbrook Plan sets out policies, including for the allocation of land, for the future development of the new town over the period up to 2031. By this point in time Cranbrook is planned to grow to close to 8,000 new homes and will have supporting facilities and infrastructure.
- 1.2 Plans and strategies such as the Cranbrook Plan are subject to a process called Sustainability Appraisal (SA) which assesses the potential impacts of a plan on social, economic, and environmental issues. A full and detailed SA has been undertaken of the Cranbrook Plan. This Non-Technical Summary presents summary details of the process followed and key conclusions reached. For a full picture of SA work the full assessment should be referred to.

## The Cranbrook Plan - development plan document

- 1.3 The current stage of SA work forms an assessment of the Publication draft of the Cranbrook Plan. Earlier appraisal work has considered earlier draft documents and consultation documents that have informed and led up to the Publication stage of plan making. The Cranbrook Plan itself will add more policy detail to the adopted East Devon Local Plan which was subject to SA in its own right.
- 1.4 There are 29 policies in the Cranbrook Plan the first half are strategic policies that are geared around higher level, more in principle issues, and the second half are more concerned with matters of policy detail. Health and wellbeing is a theme that runs through the plan and the first policy, CB1, is concerned with promoting health and wellbeing outcomes and sets an overarching framework in respect of the rest of the Plan. Policies CB2 to CB5 of the plan are of particular importance as they explicitly allocate land for development and other strategic policies set out key phasing and infrastructure requirements. Affordable housing policy is included in the plan as well as policies in respect of energy efficiency and green transport. Landscaping, environmental and recreational themes are prominent in plan policies. Delivery of a successful town centre is specifically addressed through plan policy as is a commercial role for London Road (the main road currently running along the southern edge of Cranbrook).

## Links between SA and Strategic Environmental Assessment

- 1.5 The SA process 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.

- 1.6 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). SEA and SA are separate processes but have similar aims and objectives. The SA work meets the requirements of the SEA Regulations and throughout this work reference to SA should be taken to include SEA as well.

### **Timetable for SA work and the Cranbrook Plan**

- 1.7 The SA work on the Cranbrook Plan draws on earlier assessment that supported production of the SA of the East Devon Local Plan. It should also be noted that the Cranbrook Plan is and was supported and complemented by a separate exercise in production of a Masterplan for Cranbrook. The Masterplan document was produced in draft form in 2017 and final form in 2019. The Masterplan includes text that sets out key themes and objectives but most importantly it has coloured in plans showing where future land uses could be located in Cranbrook. The Masterplan work has helped inform and constitutes evidence behind the Cranbrook Plan. Whilst the SA work is primarily concerned with assessment of the Cranbrook Plan it does also review the Masterplan itself.
- 1.8 Work on a Cranbrook Plan started in 2015 and in July and August 2015 an initial scoping consultation was undertaken, this consultation was light touch and sought views on potential issues for inclusion in the Cranbrook Plan. This first stage of plan making was not accompanied by SA work. The next stage of consultation on the Cranbrook Plan was in respect of an Issues and Options report that was accompanied by an SA report. Consultation took place in June and July 2016 and was concerned with a number of key options on broad themes for development of the new town. This work was followed by a Preferred Approach consultation, also accompanied by an SA, which was consulted on in late 2017/early 2018. The Preferred Approach documents set out more definite suggested policies and land allocations for development of Cranbrook.
- 1.9 We are now at the point where the Cranbrook Plan has reached the Publications stage of plan making and, alongside this SA work, is to be available for public comment. The Publication stage of plan making is the draft of the plan that the Council regard as being sound and appropriate for final adoption. Following Publication consultation the Cranbrook Plan, the SA, other supporting evidence documents and any representations or comments received whilst out for comment will be submitted for examination that will be undertaken by the Planning Inspectorate.
- 1.10 This non-technical summary majors on assessment findings in respect of the Publication draft of the plan but it should be noted that the publication draft has been explicitly informed by earlier stages of work on Cranbrook Plan and Masterplan preparation.
- 1.11 There were a number of stages in SA work, as reported in the full SA of the Cranbrook Plan. These are summarised in the chapters that follow.

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

## 2 Methodology and Approach to the Sustainability Appraisal

2.1 The full SA highlighted the need to follow a number of procedural stages (A to E), these are summarised with commentary set out below.

### Stage A - Setting the context and objectives, establishing the baseline and deciding on the scope

2.2 The SA process began in September 2015 with the production of a Scoping Letter for the Cranbrook Plan, this cross-referenced to earlier local plan scoping work. 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. Key matters addressed in the scoping letter included commentary relating to:

- Policies, plans and programmes of relevance to the Cranbrook Plan;
- Baseline information on environmental, social and economic issues of relevance to the Cranbrook Plan;
- Key sustainability issues for the Cranbrook area; and
- A Sustainability Appraisal framework, comprising the SA objectives against which options and subsequently policies would be appraised.

2.3 The Scoping letter was subject to consultation and feedback received help refine overall work.

2.4 Establishing SA objectives to evaluate policy options and choices against is a key factor in SA work and from the scoping stage of work the SA objectives set out below were established for use in plan assessment work. They effectively form a framework that policies can be considered against to determine whether the expected impacts can be expected to be positive and negative. In so doing they provide information to inform potential refinement of emerging plan policy.

**Table 1 – SA Objectives Used in Plan Assessment**

SA Objectives	
1.	To ensure everybody has the opportunity to live in a decent home.
2.	To ensure that all groups of the population have access to community services.
3.	To provide for education, skills and lifelong learning.
4.	To improve the population's health
5.	To reduce crime and fear of crime.
6.	To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.
7.	To maintain and improve cultural, social and leisure provision.
8.	To maintain and enhance built and historic assets and their settings.
9.	To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.
10.	To maintain the local amenity, quality and character of the local environment.
11.	To conserve and enhance the biodiversity of East Devon.

SA Objectives	
12.	To promote and encourage non-car based modes of transport and reduce journey lengths.
13.	To maintain and enhance the environment in terms of air, soil and water quality.
14.	To contribute towards a reduction in local emissions of greenhouse gases.
15.	To ensure that there is no increase in the risk of flooding.
16.	To ensure energy consumption is as efficient as possible.
17.	To promote wise use of waste resources whilst reducing waste production and disposal.
18.	To maintain sustainable growth of employment for East 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.
20.	To encourage and accommodate both indigenous and inward investment.

### Stage B: Developing and refining options and assessing effects

- 2.5 Following the SA scoping consultation there was an SA of the Cranbrook Plan Issues and Options consultation and then of the Preferred Approach document. These two stage of SA work were also subject to consultation. The SA work established appropriateness of the general direction of travel in these two stages of plan making and also included assessment of potential areas of policy coverage at the preferred approach stage of plan making. It should also be noted that SA was also undertaken of the emerging Cranbrook Masterplan of 2017 and also the final Masterplan of 2019.
- 2.6 The SA of the emerging plans (and now used in the Publication assessment) was based around a ‘scoring system’ of symbols used to compare policy option and choices against SA objectives, the nature of effects recorded is set out in the table below. The scoring symbols were accompanied by supporting commentary.

**Table 2 – Scoring measures used in SA Assessment Work**

++	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).

- 2.7 The Issues and Options stage of plan making considered four scenarios that generated diagrammatic options of potential future development. The scenarios that were appraised 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 45 dwellings per hectare and development within areas subject to noise levels above recommended limits; and
  - Scenario 4. Increased average density to 45 dwellings per hectare and some land within Neighbourhood Plan areas.
- 2.8 These scenarios, as shown through SA work, illustrated that maintaining current average housing density levels 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.
- 2.9 The diagrammatic scenarios were essentially concerned with looking at spatial areas and locations for future development, as well as density, and the outputs of appraisal confirmed the appropriateness, in sustainability terms, of the broad pattern of development set out in the Cranbrook Plan land allocations at Publication stage of plan making.
- 2.10 The SA of the issues report advised:
- “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.”*
- 2.11 It was this scenario 4 broad approach to distribution that was carried forward from the Issues and Options report into the Preferred Approach report. As part of the Preferred Approach SA work key themes, linked to evidence documents and as featured in the 2017 draft of the Masterplan, were assessed. The themes examined were:
- Planning for health and wellbeing;
  - Culture and Community facilitate provision;
  - Economic Development and Provision of land for jobs;
  - Education provision;
  - Transport and movement in and through Cranbrook;
  - Landscape and visual impact considerations;
  - Open Space Sports Pitch Provision



- Provision of open space for habitat mitigation impacts;
  - Sustainable Urban Drainage provision;
  - Undergrounding of overhead powerlines;
  - Provision for gypsy and travellers; and
  - Issues surrounding airport noise.
- 2.12 For these consideration various approaches and alternatives were assessed. The SA identified a number of favoured options and approaches to the spatial distribution of further development at Cranbrook.
- 2.13 Airport noise, landscape considerations and floodplains were identified as critical considerations in determining the extent of land that might have scope for accommodating further development. Areas with significant landscape and airport noise constraints were seen through the SA and wider work as being at or close to being absolute constraint on development. The option of building on the floodplain was not tested through the SA work as it was taken as an absolute constraint in its own right.
- 2.14 Building north of the Exeter Waterloo railway line, specifically for anything that is of a strategic or large scale, is seen as a theoretically possible option but had not been considered in detail in this SA work (bar for an area of land recorded Lodge Trading Estate) on account of significant floodplain constraints and because there are large tracts of land that are in National Trust ownership. Furthermore the Preferred Approach work identified that any new vehicular crossing of the railway, which strategic or large scale development would require, would be extremely expensive (if not prohibitively so).
- 2.15 The Preferred Approach work identified two larger scale potential areas of search for future Cranbrook expansion, one to the south east and one to the south west. The work identified, however, the likelihood of limits to how far southward or westward development should be accommodated, as constrained by airport noise and landscape considerations.
- 2.16 To the south east of Cranbrook, south of London Road, the constraints to development were identified as less pronounced. There is not the aircraft noise to contend with and land is flatter in profile, other than where it is closer to the village of Rockbeare and there is visual connectivity between the village and potential development land. But it was identified that the further south and east any development would become the further away from and hence more remotely located it would be from core facilities, including the town centre of Cranbrook. The SA work, referencing the Masterplan, also considered a number design principles as summarised below:
- 2.17 **Principle 1: Compact urban form** - broadly speaking securing a compact urban form was seen to have positive sustainability impacts when 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) scored positively, as did health (objective 4).
- 2.18 **Principle 2: Higher density housing and amenities close to the key movement corridors** – amongst other matters it was noted in the SA that 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. However, with higher density housing close to neighbourhood centres it was identified that there could be adverse impacts from the mass and scale of development unless carefully planned for.

- 2.19 **Principle 3: Strong links between Cranbrook, Cranbrook station and employment areas** - the principle scored highly when measured against employment and economic growth objectives. Against other SA objectives impacts were identified as negligible though uncertain question marks appeared 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.
- 2.20 **Principle 4: The identity of Cranbrook shall be informed by landscape features and character** – specifically in protecting landscape quality this principle scored highly.
- 2.21 **Principle 5: Attractive pedestrian and cycle routes for commuting and leisure** - measured against a range of SA objectives there were a wide range of significant positive benefits, specifically SA Objectives for Health (4), leisure and recreation (7) and Sustainable Transport (12).
- 2.22 **Principle 6: Integration with public transport** - this recorded 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).
- 2.23 **Principle 7: Health provision** - this principle scored a significant positive against the SA health objective (4). It scored 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.
- 2.24 The principles in the Masterplan, compared against alternatives, performed well through the SA process. The Masterplan work also helped inform land allocations and the testing of sites proposed for development through plan work when compared against alternatives. The SA work showed proposed development areas generally performing well and better than the tested land areas that do not feature in allocations.
- 2.25 In total 25 sites or blocks of land featured in the site SA work at the Preferred Approach stage of plan making. The SA work and the comparative impacts measured against the sustainability impacts confirmed an overall appropriateness of the areas identified for built development in the 2017 Masterplan. 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 performed 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 scored reasonably well though there are clear concerns in respect of the ability of these sites to support and secure infrastructure and facilities alongside housing development.

- 2.26 In respect of policy considerations there were 34 separate policy approaches that were tested in the SA at Preferred Approach stage of plan making. These were considered against alternatives. The policies at Preferred Approach built on the masterplan evidence and their appraisal showed, broadly speaking, positive impacts arising from their inclusion in the plan.

### **Stage C: Preparing the Sustainability Appraisal Report**

- 2.27 The Cranbrook Plan at plan Publication stage (the current stage of plan making work) has been subject to detailed appraisal, as has the 2019 draft of the Masterplan. The SA work on the Publication plan, drawing on earlier appraisal work, involved undertaking (amongst other matters) a policy by policy assessment of the Cranbrook Plan, compared against alternatives, and also an assessment of potential site options for development at Cranbrook.

### **Stage D: Seek representations on the Plan and the Sustainability Appraisal Report**

- 2.28 The Cranbrook Plan and the SA will be published and representations will be sought on both documents. Consultation is planned for spring 2019. Plan submission and examination will then occur and at plan adoption a revised SA report will be produced.

### **Stage E: Monitoring the significant effects of implementing the Plan**

- 2.29 The plan and its policies are monitored and the SA of the publication plan sets out proposed matters for monitoring.

### **Difficulties encountered in the SA work**

- 2.30 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. At the earlier stages of plan making the greatest challenges related to the fact that there were not specific policies to assess; rather assessment was based around somewhat more conceptual ideas and principles and to some degree, specifically at the preferred approach stage of plan making, assumptions made around the form and possible detail that subsequent policy may take. There were, therefore, unknowns and many matters of detail that are now only clearer at the Publication stage of plan making. However, even at this stage there are unknowns in respect of how a given policy may be applied at the decision making stage and how implemented may happen in practice.

### **Review of plans, policies and programmes**

- 2.31 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 international, national and local levels.
- 2.32 The SA assessment work reviews plans, policies and programmes that may be relevant to the Cranbrook Plan. At the international level, the SEA Directive and the Habitats Directive

are particularly significant as they require SEA and Habitats Regulations Assessment (HRA) to be undertaken in relation to the Cranbrook Plan. There are also a wide range of other relevant EU Directives. It should be noted that separate HRA work in support of the Cranbrook Plan has been undertaken.

- 2.33 In the review of plans, policies and programmes particular attention was attached to the new (2018) National Planning Policy Framework, as the key national policy guidance document, and also to the adopted East Devon Local plan which sets out clear policy for the future development of Cranbrook. At a more local to Cranbrook level there are also made and emerging neighbourhood Plans covering Parishes that abut Cranbrook, with policy coverage that overlaps land that falls in the Cranbrook Plan area.

### **Baseline information**

- 2.34 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. The SA of the Cranbrook Plan provides information on these issues.
- 2.35 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. It was this baseline information, augmented by some more locally collected data for Cranbrook that underlay the Cranbrook Plan SA work. For Cranbrook, by way of summary, the SA report advises that:
- Cranbrook is being developed as a new town to include employment land, services and facilities alongside new housing, within the context of significant growth within the 'West End' of East Devon.
  - As well as being linked to Exeter by rail there are good quality footpaths, cycle routes and bus services to surrounding areas.
  - A new primary school opened in September 2012 and a new healthcare facility in spring 2015. A second primary school and the first secondary school at Cranbrook opened in September 2015.
  - Cranbrook is served by a Combined Heat and Power System that is already producing heat and electricity.
  - 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 sufficiently close and susceptible to adverse recreation impacts to warrant formal mitigation.
  - Hellings Park Fen north of Cranbrook 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, the number of veteran trees it includes and an important population of pearl-bordered fritillary butterfly.

- Cranbrook is located approximately 4 kilometres from the East Devon Area of Outstanding Natural Beauty (AONB) and 10 kilometres from the Blackdown Hills AONB. Cranbrook lies in the 'lowland plains' landscape character type, as identified in the East Devon Landscape Character Assessment. This area comprises low lying land adjacent to river valleys. It is flat and in mixed cultivation, with a variety of field sizes and patterns.
- The landscape around Cranbrook is relatively flat but falls away steeply to the south along an escarpment bordering the airport and Rockbeare village. The land rises sharply in the north east of Cranbrook towards the green wedge east of Whimple.
- The Clyst Valley Regional Park (CVRP) as a green infrastructure initiative that will provide high quality natural green space. The CVRP surrounds Cranbrook and parts within it could potentially mitigate recreational impact on the East Devon Pebblebed Heaths and the Exe Estuary.
- Most of Cranbrook lies outside of high flood risk zones, although there are areas of flood zones 2 and 3 at and around Cranbrook.
- Much of the Cranbrook development area and surrounding land is 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.
- Rockbeare Manor Registered Park and Garden is located approximately 500 metres to the south east of Cranbrook and there are a small number of listed buildings within and around Cranbrook. Approximately 5 kilometres 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.
- 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.

### **Likely evolution without the Cranbrook Plan**

- 2.36 In recognition of SEA Regulation requirement it is appropriate to describe the likely evolution, measured against key sustainability issues, if the Cranbrook Plan were not to be produced and adopted. Potential implications, as noted in the full SA report, are tabled below.

**Table 3 – Potential Evolution in the Absence of the Cranbrook Plan**

Key Sustainability Issue	Likely evolution of the issue without implementation of the Cranbrook Plan
<p>The need to ensure that large-scale new development is appropriately integrated into the landscape, respecting and enhancing local character where possible.</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. 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 plan for Cranbrook would mean that the development is less likely to be comprehensively planned and well-integrated into the landscape.</p>
<p>The need to ensure that large scale new development is compatible with the wider transport network.</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 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 in more fined grained detail would be lost, as would opportunities to include locally specific policies relating to this issue.</p>
<p>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.</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 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 Cranbrook Plan the 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.</p>

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, in some detail, 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 and subsequent policy formulation 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. The distribution of uses has been considered in great detail through the Cranbrook Plan making process and as translated into plan wording and the policies map. Therefore, in the absence of the Plan, the issue would not be as comprehensively addressed.</p>

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

- 3.1 The Cranbrook Plan, at February 2019 is at the Publication stage of plan making. The SA work was split into three chapters in the full SA report. The first stage of assessment was concerned with over-arching objectives that feature in the Cranbrook Plan. The most useful output of this stage of assessment is to be able to review whether the Cranbrook Plan objectives cover all of the sustainability matters identified through the SA sustainability objectives.
- 3.2 The Cranbrook Plan objectives are set out on the table on the next page, in the first column, and these are compared against the SA objectives in the following columns. The table is extracted directly from the full SA report. Symbols illustrate the nature of impacts identified.
- 3.3 All of the Cranbrook Publication Plan objectives show some positive impacts, typically with a likelihood to have a significant positive effect, on at least one SA objective; specifically a significant positive effect has been identified where the plan objective most directly corresponds with the thrust of the SA objective.



**Table 4 – Publication Plan Objectives compared to SA Objectives**

SA Objectives	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
01. Health and wellbeing is designed and integrated into all parts of the town to reduce the development of long-term health conditions	0	0	0	++	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
02. A balanced, active community with the best health and wellbeing outcomes in the UK	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
03. The best outdoor environment for everyone, including the young and vulnerable	0	0	0	++	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0
04. From the start new technology helps health and wellbeing services work together to provide the most effective services	0	+	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
05. A confident, supportive, balanced and diverse community at the heart of decision making	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
06. Enough community, sport, leisure and cultural facilities and spaces to satisfy the needs of the whole community in Cranbrook and to support and encourage creative projects	0	++	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0
07. Sports and cultural activities are accessible to all, part of the fabric and community of Cranbrook	0	++	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0
08. Cranbrook secures its identity as a small enterprise town with a successful business community, recognised for identifying new business opportunities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	++
09. Enough affordable business spaces to satisfy the needs of new and existing businesses from in and around Cranbrook	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	++

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10. All residents can access excellent education to develop the skills they need to fulfil their ambitions	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+
11. Vibrant town and neighbourhood centres which are busy and successful both in the day and evening	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	++	+
12. To deliver Zero Carbon development in the expansion of Cranbrook	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	++	0	0	0	0
13. Reduce the amount of harmful greenhouse gases Cranbrook sends into the atmosphere by being more energy efficient and making greater use of renewable energy	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	++	0	0	0	0
14. Be fully informed and prepared for the effects and impact of climate change	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0
15. Encourage and enable residents to minimise their carbon footprint by reducing the need to travel; but where necessary, to travel using sustainable means, comprising the use of public transport, walking and cycling	0	0	0	+	0	0	0	0	0	0	0	++	+	++	0	0	0	0	0	0
16. To encourage the purchasing of local goods and materials by residents and the developers and ensure that waste is recycled wherever possible	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	+	0	+
17. The majority of journeys originating from Cranbrook are made using sustainable transport.	0	0	0	+	0	0	0	0	0	0	0	++	+	++	0	0	0	0	0	0
18. An integrated, coordinated transport system enabling people to move easily within Cranbrook and to its neighbours and beyond	0	0	0	+	0	0	0	0	0	0	0	++	+	++	0	0	0	0	0	0

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19. An excellent network of safe walking and cycling routes in and around Cranbrook making active transport the first choice	0	0	0	+	0	+	++	0	0	0	0	++	+	++	0	0	0	0	0	0
20. Parking is well designed to not be intrusive or dominant and with enough space to serve the community's needs	0	0	0	0	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0
21. Be ready for future developments in transport technology	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22. Good quality allotments, community gardening spaces and private gardens encourage people to grow food and enjoy outdoor activity	0	0	0	0	0	0	++	0	+	0	+	0	0	0	0	0	0	0	0	0
23. Green spaces and landscape features within and around Cranbrook are linked and have a variety of functions, making sure that they are as valuable and accessible as possible to the community and wildlife.	0	0	0	++	0	0	++	0	+	0	+	0	0	0	0	0	0	0	0	0
24. Buildings and open spaces include nesting boxes and other features to create wildlife habitats that the community can also enjoy	0	0	0	0	0	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0
25. Features such as ponds and ditches are used to collect storm water and designed so that they help to create attractive streets and open spaces	0	0	0	0	0	0	0	0	++	+	0	0	++	0	++	0	0	0	0	0
26. To secure buildings and spaces that are designed to encourage good health and wellbeing in residents and visitors of all ages	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
27. A wide range of well designed homes are available to rent and buy	++	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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28. Spaces and buildings are designed to encourage people to talk to one another, allow people to trade goods and services and can easily be adapted to meet the changing needs of the community	0	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	++	+
29. Spaces and buildings are designed to prevent crime and anti-social behaviour without the need for visible security	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30. Development at Cranbrook recognises change over time and allows flexibility of use and provides opportunity and space for emerging needs of the community.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31. Cranbrook will develop as a sustainable new town, phased to ensure the community's needs can be met both during development and long into the future.	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+

- 3.4 The next stage of Publication Plan appraisal was specifically concerned with the policy wording in the Cranbrook Plan. The policies of the Cranbrook Plan evolved from policy approaches suggested in the Preferred Approach stage of plan making and they were informed by earlier Masterplanning work and assessment.
- 3.5 There were some policies (policy subject matters) that featured at the Preferred Approach stage of plan making that are not included in the Publication draft. In some cases they were not carried forward as they are in respect of detailed matters of development that may be physically at or close to Cranbrook but they are not seen as a requirement or essential for Cranbrook delivery and can be implemented through other wider policy agendas or decision making actions. In other cases subject matters that had a stand-alone policy at the Preferred Approach stage of plan making are now addressed through or rapped-up into Publication draft policies covering a number of matters. It should also be noted that some separate policy matters at Preferred Approach stage of plan making were merged into broader coverage Publication stage polices.
- 3.6 The appraisal of plan policies shows that overall they perform well when measured against the sustainability objectives. Alternatives to the actual policies were tested but on-balance, taking all SA outcomes into account, the alternative options performed worse.
- 3.7 The table on pages at the end of this section show, in the rows, the policy appraisal for all policies in the plan (but not the alternatives). Overall most of the policies see some significant positive outcomes when compared against the SA objectives, there are, however a number of distinct patterns that emerge. The SA objectives of 1 - housing, 2 - community services, 3 - education and skills, 4 – health, 7 - leisure and recreation, 12 - sustainable transport and 14 - greenhouse gas emissions all scored particularly highly. These are all key themes that run through the Cranbrook Plan and have been of critical importance in its production.
- 3.8 The key job of the Cranbrook Plan, and for Cranbrook in general, is to accommodate extra new housing and therefore it is appropriate that promoting decent homes for people to live in is positively promoted in plan policy. A clear cumulative impact of the plan will be, in a positive sense, new home provision. Alongside provision of housing there is, however, a strong theme, reflected in significant positive impacts in plan policy for supporting community infrastructure and facilities, including schools. Health is also an SA subject matter that policies strongly cover and address and this reflects the relevance to health that has been incorporated into and addressed through the Cranbrook Plan work and preparation. Allied to health is the issue of leisure and recreation which many plan policies also address in a positive manner.
- 3.9 The other subject matters that score highly against the SA objectives are 12 - sustainable transport and 14 - greenhouse gas emissions; the two have strong links anyway and sustainable transport, specifically by encouraging walking and cycling, has strong links with the health agenda. The green energy credentials of Cranbrook are also of great significance in plan policy hence SA assessment, this assists with generally positive scores for SA objective 16 for energy efficiency.
- 3.10 The SA economy objectives of 18 – employment, 19 - town vitality & viability and 20 Inward investment see fewer significant positive impacts and whilst a number of policies in the plan promote positive economic outputs they receive less direct policy support than the housing,

community, health and green transport/energy subject areas. Also less explicitly addressed in policy, noting fewer significant positive scores, are the environmental themes addressed through SA objectives of 8 - historic environment, 9 - landscape character, 10 amenity and 11 - biodiversity. Any development can have some detrimental environmental impacts and when of a large scale these can be multiplied. It is for this reason that against the SA objectives the potential for some minor but not expected to be significant (assuming policy is effectively implemented) adverse impacts are noted.

- 3.11 SA objective 5 for crime sees no positive significant impacts in respect of policy assessment though there are no negative impacts, save for question marks over possible security issues in respect of a transport policy. Noise is also an SA subject area with a number of potential negative impacts. Whilst policy is robust in respect of airport noise there remains some question marks over noise related to road vehicles, especially on London Road, and also from the railway. Though it is recognised that some safeguards are built into policy.
- 3.12 Floor risk matters are specifically addressed through Policy CB27, with a significant positive impact noted when assessed against SA objective 27 that addresses flooding matters. In other respects negligible impacts scores are noted. Waste in the one SA objective subject matter where significant negatives are recorded. Any large scale development of housing is likely to generate high levels of waste.
- 3.13 This brief synopsis presents a positive policy agenda for Cranbrook as set out in the plan. The cumulative picture is one of high expectations in terms of housing provision in a healthy community with good facilities that is geared around encouraging people to walk and cycle.

**Table 4 – Publication Plan Objectives compared to SA Objectives**

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
CB1 – Health and Wellbeing at Cranbrook	+	+	+	++	0	+ ?	++	0	0	0	0	0	0	+	0	0	0	0	0	0
CB2 – Bluehayes Expansion Area	++	++	++	++	0	-?	+	-?	-	0	0	++	-	++	0	0	--	+	+	+
CB3 - Treasbeare Expansion Area	++	++	++	++	0	-?	+	-?	-	0	0	++	-	++	0	0	--	+	+	+
CB4 - Cobden Expansion Area	++	++	++	++	0	-?	++	-?	-	0	0	++	-	++	0	0	--	+	+	+
CB5 - Grange Expansion Area	++	++	++	++	0	-?	++	-?	-	0	0	++	-	++	0	0	--	+	+	+
CB6 - Cranbrook Infrastructure Delivery	0	++	++	++	+	0	++	0	-?	+	+ ?	++	0	++	0	++	0	0	+	+
CB7 - Design – Phasing	0	++	++	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0
CB8 - Cranbrook and Broadclyst Station Built-up Area Boundaries	0	0	0	0	0	0	0	+	+	0	+	0	0	0	0	0	0	0	0	0
CB9 - Public Transport Enhancement	0	++	+	+	0	?	+	0	0	0	0	++	0	++	0	+	0	+	+	+
CB10 - Safeguard land for a second railway station	0	0	0	0	0	0	0	0	-?	0	0	++	+	+	0	0	0	0	0	0
CB11 - Cranbrook Affordable Housing	+	+	+	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0
CB12 - Cranbrook Custom and Self-build housing	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+
CB13 - Delivering Zero Carbon	+	0	0	+	0	0	0	0	-	0	0	++	0	++	0	++	+	+	0	+
CB14 - Safeguarding of Land for Energy Centre	0	0	0	0	0	0	0	0	-	0	0	0	0	++	0	++	+	0	0	0
CB15 - Delivery of Suitable Alternative Natural Green Space (SANGS)	0	0	0	++	0	0	++	0	?	0	?	0	0	+	0	0	0	0	0	0
CB16 - Design Codes and Place Making	+	+	0	0	0	0	0	+	+	+	0	+	0	0	0	0	0	0	0	0
CB17 - Amenity of Future Occupiers	++	0	0	++	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0
CB18 – Digital Connectivity	++	0	0	0	0	0	+	0	0	0	0	?	0	0	0	0	0	++	?	++
CB19 – Coordinated sustainable travel	0	0	0	+	?	+	+	0	0	+	0	++	0	++	0	+	0	0	0	0
CB20 - Plug-In and Ultra low Emission vehicle charging	0	0	0	0	0	+	0	0	0	0	0	+	+	+	0	+	0	0	0	0
CB21 - Parking at Cranbrook	+?	0	0	-?	0	0	0	0	0	+	0	-?	0	-?	0	0	0	0	0	0

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CB22 - Cranbrook Town Centre	+	+	0	++	0	0	++	0	0	0	0	+	0	+	0	+	0	++	++	+
CB23 - Residential Development in the town centre and neighbourhood centres	++	0	0	0	+	-?	0	0	0	?	0	+	0	+	0	0	0	0	++	+
CB24 - London Road Commercial and retail proposals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	?	+
CB25 - London Road Improvements	0	0	0	0	0	?	0	+?	0	+?	0	+	0	0	0	0	0	+	0	+
CB26 - Allotments and community gardening	0	+	+	++	0	0	++	0	+	+	+	0	+	0	0	0	0	0	0	0
CB27 – Landscape, Biodiversity and Drainage Strategy	0	0	0	0	0	0	+	+	++	+	++	0	+	0	++	0	0	0	0	0
CB28 - Design and Construction of Sports Pitches	0	0	0	++	0	0	++	0	?	0	-?	0	0	0	0	0	0	0	0	0
CB29 - Tillhouse Farm Redevelopment	0	+	0	0	0	0	0	++	0	+	0	0	0	0	0	0	0	+	0	+



- 3.14 The final section of the full SA appraisal document considered land and site development options at and around Cranbrook. The policies of the Cranbrook Plan allocate four large land areas for development;
- CB2 – Bluehayes Expansion Area;
  - CB3 - Treasbeare Expansion Area;
  - CB4 - Cobden Expansion Area; and
  - CB5 - Grange Expansion Area.
- 3.15 In the full SA report there is a cross reference link between the land allocation policies and the site by site assessment work. Overall the land allocations typically were identified to have lesser adverse sustainability impacts than the non-allocated sites, i.e. the sites that have been appraised but are not allocated in the plan nor are identified to fall in Built-up Area Boundaries in the plan. This critique of allocated site suitability is especially relevant in respect of SA Objectives 6 for noise and 9 landscape impacts. Overall the allocations (specifically where formed by the larger sites but also in conjunction when smaller land areas are also part of the allocations) have significant positive impacts against SA objectives 1 - Housing, 2 - Community services, 3 - Education and skills, 4 - Health, 12 - Sustainable transport and 14 - Greenhouse gas emissions. They also have positive impacts against a range of the other SA objectives, specifically including - 7 - Leisure and recreation, 18 - Employment, 19 - Town Vitality & viability and 20 - Inward investment.
- 3.16 Landscape impact considerations were key to informing the Masterplan, which subsequently informed plan policies and land allocations, 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 concerns in respect of the ability of these sites to support and secure infrastructure and facilities alongside housing development.

## 4 Monitoring

4.1 The SEA Regulations require that monitoring is undertaken in relation to the significant effects of implementing the Plan in question. Table 4 below sets out a number of suggested indicators for monitoring the potential significant sustainability effects of implementing the Cranbrook Plan. Note that the indicators proposed are included as suggestions at this stage, as it is recognised that many datasets may not be available for monitoring some of the sustainability effects of the Plan, and that the indicators included may change as overall work progresses.

**Table 4 – Publication Plan Objectives compared to SA Objectives**

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>

SA objectives for which potential significant effects have been identified	Suggested indicators
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> <li>• Renewable energy generation in kWh by type over a monitoring period</li> </ul>
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>

## 5 Conclusions

- 5.1 The SA work at this Publication draft stage of plan making has taken a systematic approach to appraising the Cranbrook Plan. Production of this SA has revisited the earlier assessment at Issues and Options stage and Preferred Approach stages of plan making. At this stage the primary purpose of appraisal is to support the publication plan and to form a full appraisal of the strategy, approach and policies of that plan.
- 5.2 This SA work has ensured 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 Publication draft of Cranbrook Plan.
- 5.3 Overall the plan is identified to have a considerable number of positive impacts, specifically including for housing provision (SA objective 1), noting that the key reason to plan for expansion of Cranbrook is to accommodate increased housing growth. Allied to the housing development the plan positively promotes community and social facilities (SA objective 2) and education provision (SA objective 3). The overall growth agenda is undertaken in the context of the plan achieving significant positive outcomes in respect of the SA objective for health (4) as well leisure and recreation (7) and promoting sustainable transport and reducing greenhouse gas emissions (12 and 14 respectively). Against other SA objectives generally positive conclusions were reached when assessed against plan policy, slightly more so for the economic objectives (18 – employment, 19 - town vitality & viability and 20 Inward investment) than the environmental (8 - historic environment, 9 - landscape character, 10 amenity and 11 – biodiversity).
- 5.4 It was only against the SA objective for waste (17) that there were significant negative impacts recorded; this reflects the fact that any large housing development is likely to generate large volumes of waste. It would be relevant to consider mitigation measures for waste and also for other cases where minor negative impacts could arise; these include in respect of landscape impacts noting that any large scale development is also likely to have potential for some adverse impacts.
- 5.5 The SA Report will be made available alongside the Publication Cranbrook Plan during the consultation period. Comments will be invited on the SA and those received, alongside comments received on the Cranbrook Plan, will be sent to the Planning Inspectorate for Cranbrook Plan examination.