

# **The Cranbrook Plan: Examination**

Matter 2: Soundness of the Plan

Statement on Behalf of East Devon New Community  
partners

## **Matter 2 – Soundness of the Local Plan**

### **Issue 3: Is the Plan based on a sound process of Sustainability Appraisal?**

Q22. Has the Plan followed a sound process of SA?

Q23. Has the SA been undertaken at each stage of the Plan's preparation to clearly justify the Council's policy choices?

Q24. Does the SA process represent the only site selection methodology? Have other methods been used?

Q25. How has the SA tested against reasonable alternative sites?

Q26. Has the SA been robustly prepared with a comparative and equal assessment undertaken of each reasonable alternative?

Q27. Are the reasonable alternatives sufficiently distinct such that meaningful comparisons can be made of the different sustainability implications?

Q28. Does it represent an appropriate strategy in the circumstances?

1. The Plan is not an appropriate strategy because it is not deliverable and has sought to seek to achieve all possibilities. Neither the DPD or the Sustainability Appraisal and perfectly appropriate strategy that would be deliverable by scrutinising and emerging with EDNCp and others, the viability assessment work. Alternative but deliverable solutions appear not to have been considered and the Inspector is requested to require that EDDC undertake constructive discussion with EDNCp and the parties to ensure that a deliverable plan is prepared.

Q29. Does the final report set out the reasons for rejecting earlier options?

AQ3. Are any Main Modifications proposed in relation to Issue 3?

### **Issue 4: Is the Local Plan justified, effective and consistent with national policy in respect of the Habitats Regulations?**

Q30. Is the Local Plan legally compliant with respect to the Habitats Regulations and any requirement for Appropriate Assessment [AA]?

Q31. Has the position of Natural England re the SOCG been finalised?

Q32. Can the Council comment on the recommended changes to policy wordings from table 2 of the HRA?

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AQ4. Are any Main Modifications proposed in relation to Issue 4?

**Issue 5: Is the Local Plan justified, effective and consistent with national policy in relation to Climate Change?**

Q33. Taken as a whole, will the Plan policies be effective in mitigating and adapting to climate change, including supporting the transition to a low carbon future?

Q34. Has sufficient provision been made in the plan to address Climate Change in accordance with Section 19(1A) of the 2004 Act?

Q35. What provision has been made for carbon offsetting?

Q36. How much of the Cranbrook extension will be served by the CHP plant? Reference is made to Cranbrook and the west end of East Devon; what is the total capacity re the number of homes that could be serviced?

2. Please see representations on Policy CB13 and statements in relation to various other matters of the Examination in particular Matter 16.
3. As explained in our response to matter 9 on infrastructure delivery, there is a collective and overlapping cost of (£27million) of Combined Heat and Power PLUS carbon reduction measures to accelerate construction standards over and above that set out in the Building regulations with their ever-enhanced standards. EDNCp has set out its concerns regarding the soundness of such policies in that statement but to reiterate these concerns:
  - a) IDP and DPD makes it clear that to continue with CHP across the expansion areas as has been the case to date, an additional plant will have to be constructed
  - b) In any event, the present system was heavily subsidised by grants and financial assistance – which will not be available in relation to any new system
  - c) the existing system continues to run off gas and is not – as was intended - run by the more sustainable pyrolysis process (using wood chip). The operator continues to assert that the system will continue to have to run off gas and is not therefore delivering the outputs that EDDC hoped to achieve. Nor will a future system given costs and technical issues.
4. The provision for CHP in the IDP and in the DPD should therefore be revisited to reflect the absence of an acceptable alternative and the present NPPF policy position namely that the units will need to be built in line with the Building Regs at the time of consent and that no additional policy expectation should be considered acceptable.

AQ5. Are any Main Modifications proposed in relation to Issue 5?

5. The first example of the SA's

