

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?

We would argue that the Plan has not followed a sound process of SA.

Firstly, in section 1.3 of the [Sustainability Appraisal of the Cranbrook Plan - Publication Draft document](#), it is “stressed” that whilst Land Use Consultants (LUC) acted as a “critical friend”, it is EDDC who are owners and compilers of the content.

Is this not suggesting that far from employing an independent arbiter, EDDC has essentially appraised its own Plan? We believe this raises a question of potential conflict of interest, therefore tarnishing the soundness of the SA process.

It’s curious that this final 2019 Sustainability Appraisal document, published by EDDC, takes a drastically different view of the impact of Southern expansion than that presented in the LUC-published documents (such as the [Sustainability Appraisal Report West End Addendum Report](#) from October 2012) .

In addition, process concerns have been raised by other parties, further adding to our argument the Plan has not followed a sound process of SA. For example, East Devon New Community Partners contest the preparation of the SA, and consider the resulting document flawed. Please see full commentary in Figure 1 of the Appendix, taken from Page 35 of the 2019 [Sustainability Appraisal of the Cranbrook Plan - Publication Draft](#) document.

Furthermore, the SA is only based on one of two planning applications for the Southern expansion of Cranbrook. It refers to 14/0046/MOUT throughout, but fails to address 17/1482/MOUT, thus we would argue that the Plan did not follow a sound SA process.

Another factor that suggests that the Plan did not follow a sound process of SA relates to the removal of criterion from H7 of the EDLP in February 2015 (see Figure 2). A presumption can be made that this decision to remove the protection of Green Wedge land was made with the Treasbare Green Wedge development in mind. Proposals to locate the gypsy and traveller pitches on the Green Wedge were published subsequent to the closure of the public Preferred Approach Consultation process, denying members of the community the chance to review and comment.

Appendix

Figure 1

Summary of consultation feedback of the SA production process.

Taken from Page 35 of the [Sustainability Appraisal of the Cranbrook Plan - Publication Draft](#) document (February 2019).

<p>David Lock Associates for East Devon New Community Partners (EDNCp)</p>	<p><u>SA Production Process</u></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"> • failure to promote sustainability objectives; • lack of consideration of cumulative synergistic effects; • lack of specific consideration given to Cranbrook as opposed to the previous East Devon context (and reuse of the old approach); • lack of consideration of mitigation and the effects of mitigation; and • the simplistic evaluation of objectives on the basis of little or limited background assessments.
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Figure 2

Removal of criterion within H7 of the EDLP.

Taken from Page 38 of the February 2015 [East Devon Local Plan Proposed Changes SA Addendum](#).

<p>H7 - Sites for Gypsies and Travellers</p>	<p>Removal of criterion relating to sites being outside of Areas of Outstanding Beauty, green wedges or designated conservation sites.</p> <p>The criteria relating to proven local need now only applies to proposals outside built up area boundaries.</p> <p>Addition of criteria requiring consideration to be given to the cumulative impacts of new sites where existing sites are not able to be expanded.</p>	<p>No change to SA findings. The removal of the criterion relating to sites being outside of Areas of Outstanding Beauty or green wedges could mean that the uncertain minor positive effect on the landscape that was previously identified is less likely to occur; however another criterion in the policy still requires developments to have no significant adverse impact on the appearance or character of the landscape; therefore the effect remains unchanged.</p> <p>The requirement for consideration to be given to the cumulative effects of nearby sites reinforces the already potential minor positive effect identified for SA objective 10: amenity and local environment.</p> <p>Other proposed changes to the policy are minor and again do not affect the SA findings.</p>
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