

Cranbrook Plan

Supplementary evidence paper including Sustainability Appraisal update in respect of policy and allocations for gypsies and travellers

July 2020

Produced by East Devon District Council

This paper has been produced by officers of East Devon District Council to provide more information on the policy approach and reasoned justification behind the allocation of sites for gypsies and travellers at Cranbrook. A key part of this overall work includes an update to the Sustainability Appraisal to specifically assess alternative site allocation options.

1 Introduction

- 1.1 At the Cranbrook Plan examination hearing sessions, on the 21st January 2020 and at following dates, it was highlighted that it would be appropriate to provide additional information to further explain policy and land allocations for accommodation of gypsy and travellers at Cranbrook. A key part of this work includes an updating of the Sustainability Appraisal (SA) that accompanied the publication draft of the Cranbrook Plan to reflect the reasons for the site selections that were made. The SA at plan Publication can be viewed at: <https://eastdevon.gov.uk/media/2761733/sustainability-appraisal-of-publication-of-cranbrook-plan.pdf>
- 1.2 The early sections to this supplementary evidence report highlight key considerations of relevance to informing justification and need for Cranbrook Plan policy. Later sections provide information about the SA process, an appended update to the SA and commentary on site suitability to accommodate gypsies and travellers.
- 1.3 This paper, and specifically the SA update, provides additional evidence to help inform the plan's examination in respect of gypsy and traveller provision.
- 1.4 It is important to recognise that East Devon District Council has a duty to look after gypsy and traveller needs, and identify and provide appropriate sites for them to live on. Cranbrook provides excellent opportunities to provide for gypsy and traveller accommodation given its location along historic travelling routes and with stopping places

that predate the new town by many decades. It is recognised that there are major challenges in delivering gypsy and traveller sites, however by making land allocations, this gives greater confidence of delivery and provides certainty to both the travelling and settled community.

2 Need for gypsy and traveller site provision

- 2.1 This paper does not seek to establish new evidence, or undertake further research into need for gypsy and traveller accommodation in East Devon District in general or specifically at Cranbrook. Relevant evidence of need is already established, however it is useful for context setting to summarise some key considerations.
- 2.2 In order to assess the level of need for Gypsy and Traveller pitches, a Gypsy and Traveller accommodation needs study was completed in 2015¹. This established that there are existing pitches distributed throughout East Devon but they are mainly concentrated in western areas of the District, close to main travel routes, particularly the A30. Most of the immediate need arises from overcrowding of, and newly formed families (usually children reaching maturity and having their own children), on existing sites who wish to stay close to their extended family. 92% of respondents to the needs assessment stated that their 'future household' wished to stay on the same site as their existing family. This was supported by the consultation undertaken in January 2018 as part of the Cranbrook Plan Preferred Approach consultation, when the principal of new pitches, on at least two sites at Cranbrook, was universally supported by local Gypsies and Travellers. In this consultation families on the overcrowded Sowton and Broadclyst sites expressed a desire to remain living locally and most indicated that they would move to Cranbrook as family groups so that they could continue offering healthcare and social support to each other.
- 2.3 As part of the Cranbrook related work, conversations with the gypsy and traveller community reported that finding suitable accommodation had worsened in recent years. As at January 2020 there is a necessity to allocate 28 permanent pitches in East Devon to meet the outstanding identified need, 16 of which are needed immediately. There is also a Devon-wide need to find 4-5 emergency stopping places/transit sites, although it is not proposed that this demand be met at Cranbrook.

3 East Devon Local Plan policy

- 3.1 The policy of the East Devon Local Plan, which was adopted in January 2016, in respect of overall and detailed provision for gypsies and travellers was informed by the evidence of need.
- 3.2 In respect of gypsy and traveller provision at Cranbrook the identification and delivery of accommodation as part of the wider development is enshrined within the development plan, specifically in Strategy 12 – Development at Cranbrook. This is an over-arching policy for the future development of the new town that, amongst other matters, will provide for its expansion to accommodate close to 8,000 new homes. Policy of the plan allocates specific

¹ <https://eastdevon.gov.uk/media/1298707/devon-partnership-2015-gtaa-final-report.pdf>

sites for part of the Cranbrook expansion, and these are labelled as W144B and W144C on the West End inset map. Strategy 12 also provides for the expansion of Cranbrook through additional land to be allocated in and through production of a Development Plan Document (now known as the Cranbrook Plan). The final paragraph of Strategy 12 advises on production of the Cranbrook Plan, and sets out more detail about its implementation including identifying an area for expansion/intensification in what is termed the Cranbrook Plan Area.

- 3.3 Under Strategy 12, and within the context of the Cranbrook Plan, there are a list of land uses that are to be accommodated at Cranbrook. These are set out in the introductory paragraph of the policy and are listed under items 1 to 6.
- 3.4 Within the itemised list of Strategy 12, item 2 advises:
“Gypsy and Traveller Provision - provision will be made for new gypsy and traveller sites to accommodate up to 30 pitches on land allocated for Cranbrook development. Provision will be required concurrently with (though in the early years of) the ‘bricks and mortar’ housing development of the allocated land.”
- 3.5 Strategy 12 item 2, sets out an expectation that gypsy and traveller sites should be accommodated at Cranbrook on allocated land. Sites within either of the existing Local Plan allocations, or within the allocations proposed as part of the Cranbrook Plan would clearly not be considered as being in countryside areas and remote from the town as they would form part of the urban extension. For this reason sites at and around Rockbeare village, for example, a settlement that is separate and distinct from Cranbrook, would not fall under an *“at Cranbrook”* definition. Further on in this report more detail is provided of sites that were assessed, specifically through the Sustainability Appraisal, and the logic for their inclusion and boundaries.
- 3.6 Policy H7 of the adopted East Devon Local Plan is specifically concerned with detailed policy considerations for the accommodation of gypsies and travellers. This policy sets out an overall level of need for gypsy and traveller pitch provision and includes seven criteria against which planning applications will be considered. Within the context of gypsy and traveller site provision at Cranbrook, the criteria listed in Policy H7 are of limited relevance for site selection. This is because sites needs to reflect the context of the emerging Cranbrook Plan (as a whole) and their relationship to the relevant allocation. A proposed site which is currently in a countryside location, would not fail against Policy H7 noting the wider change that will result from the allocation being built out.
- 3.7 In noting the adopted Local Plan’s expectation (and therefore the starting point) that gypsy and traveller site provision is found on the identified allocations, it is It is also relevant to note that during Local Plan examination the East Devon New Community partnership (developer consortium for the current build out of the town) then promoting three of the expansion sites at Cranbrook, signed a statement of common ground with East Devon District Council on the 17 June 2015 that at its paragraph 3.35 advised:

“3.35 To address a deficiency in the submitted Local Plan, EDNCp have agreed to include a site or sites suitable for 30 gypsy pitches within the expanded area of Cranbrook. EDNCp agree to make available one or more sites to EDDC within the expansion area within five years.”

3.8 The full statement of common ground forms Appendix 1 to this paper.

4 Current Proposed policy in the Cranbrook Plan for gypsy and traveller provision

4.1 There are two policies in the Cranbrook Plan that make provision for gypsies and travellers;

- CB3 Treasbeare Expansion Area – which advises that there will be *“5 serviced permanent pitches for gypsies and travellers on an area of at least 0.5 hectares.”*

And

- CB4 Cobdens Expansion Area - which advises that there will be *“10 serviced permanent pitches for gypsies and travellers on an area of land of at least 1 hectare”*

4.2 On the Cranbrook Plan policies map the allocated land areas are shown by brown vertical stripes against yellow/brown background shading.

4.3 This provision of 15 pitches at Cranbrook will meet just over half of the identified need of 28 pitches and fulfil almost all of the immediate need for 16 pitches in East Devon. This allocation represents half of the ‘up to 30 pitches’ maximum set out in Strategy 12 of the East Devon Local Plan 2013-2031 and is considered to represent a suitable quantum of pitches when having regard to the scale of the resultant settled community in Cranbrook, in line with Planning policy for traveller sites².

5 Sustainability Appraisal of the Cranbrook Plan

5.1 Chapter 10 of the SA that supported the Cranbrook Plan publication specifically assessed potential alternative sites for the future development of Cranbrook. The SA advised, however, that this assessment was

“..... primarily concerned with in principle suitability of land for development as opposed to any specific policy wording that may be attached to or accompany any provision for development that may be made” (see paragraph 10.1 of the SA).

Further on in this section of the SA it is also noted that on development sites *“housing (is) assumed to be the predominant land use”* on assessed sites (see paragraph 10.11). It is, of course relevant and important to note that gypsy and traveller sites and pitches are one amongst many diverse forms of housing.

5.2 Following on from discussions at the Cranbrook Plan hearing sessions the SA has been updated to more fully address consideration of sites for accommodation of gypsies and travellers. Appendix 2 to this paper explains the scoring system used in the SA work and Appendix 3 forms a proposed update to the SA. The rewording in the SA document comprises of:

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf

- a) Amendments to text where there were clear minor drafting errors in the original assessment;
- b) New text in introductory paragraphs, 10.1 to 10.16, to advise that assessment not only considers suitability of sites in general for accommodating development but also now to consider appropriateness for accommodating gypsies and travellers;
- c) New text in the tables that follow paragraph 10.16 to provide specific commentary on site suitability to accommodate gypsies and travellers; and
- d) New text after the tables in respect of key conclusion reached in respect of accommodating gypsies and travellers.

5.3 The intention is that the proposed amended SA text, if and where appropriate with further amendments arising from the Examination process, will be added to the full SA, in future iterations. It should be noted that at plan adoption a final SA will be produced that can be expected to incorporate changes to note that the plan is adopted and also to provide updates to reflect any Main Modifications that are made to the Plan.

6 Commentary on gypsy and traveller site allocations

- 6.1 An SA forms an evidence base to inform policy and site allocation choices and it provides information for use by policy makers. By clear intent the SA does not seek to provide definitive answers or conclusions, it needs to be seen and used alongside other evidence in reaching decisions. Any commentary on sites in the SA does, therefore, need to be seen within this context.
- 6.2 What the SA process does show is that there are a number of site options at Cranbrook that could potentially positively accommodate a gypsy and traveller site, and it does highlight a number that would appear unreasonable options, specifically on account of their being significant potential concerns or delivery problems.
- 6.3 There are a number of small sites that have been evaluated through the SA process, and some in many respects, perform well. However where these small sites are not part of a much larger commercial land holding, comprising of larger areas of land that are planned to be developed, it is seen as unlikely that they would come forward for gypsy and traveller use. There would not be the commercial incentive for a land owner to bring them forward for such a use, or at least not so long as they hold out for the hope of higher commercial returns that bricks and mortar housing could achieve. This factor alone weighs heavily against the appropriateness of allocating many of the smaller site options at Cranbrook. Larger land parcels/sites provide greater flexibility and a better opportunity for delivery.
- 6.4 One of the major considerations in respect of identifying suitable sites for gypsy and traveller accommodation, is the need to avoid areas with higher noise levels. Gypsy and traveller sites, which accommodate homes with much lower sound insulation standards than regular bricks and mortar housing, are particularly susceptible to noise pollution. For Cranbrook, noise pollution concerns are especially relevant for site options that are closest to the airport and this weighs heavily against some of the sites assessed. In respect of noise considerations the two sites allocated in the Cranbrook Plan are well sited in respect of noise avoidance, though the more easterly site, at Cobdens, will potentially need setting

back from London Road to ensure adverse noise impacts are not experienced from the adjacent road. The physical site size allocated at Cobdens is, however, such that this is not considered to be a major problem.

- 6.5 In contrast to noise concerns, however, because gypsy and traveller sites are less prominent in the landscape than bricks and mortar housing (specifically they are lower in height), they may be better suited to areas where landscape sensitivity is of greater significance. This is also a factor that plays to the advantage of the allocated sites in the Cranbrook Plan. They both fall in locations where the siting of bricks and mortar housing could be prominent, whereas lower height gypsy and traveller development will be far more readily and quickly assimilated into the landscape and screened through landscape planting. The gypsy and traveller site allocated on the eastern edge of Cranbrook, at Cobdens, already benefits from some mature hedgerows to the site boundaries and with this use having lower impacts than bricks and mortar housing it is more appropriate in respect of possible adverse heritage impacts. However, with regards to heritage and more significantly landscape considerations, extra planting would also be appropriate to manage the impacts of the development.
- 6.6 While not drawn out specifically within the assessment it is considered that there is a hierarchy of preference for road access and the types of road being used – those sites with direct access to the London Road being the highest (most preferential sites), while those that require the use of extensive lengths of suburban estate roads being best avoided due to the narrowness of the road and the different scale and nature of traffic to be accommodated. Local distributor roads sit somewhere in the middle where regard is given to the length of road then needed to access the main London Road. A particular attraction of the allocated site in the Cobdens Area is that it is directly adjacent to London Road, a route with historic cultural links to the travelling community. Whilst at Treasbare the site is a short distance from London Road and towards the bottom of the valley (set below a wide country lane) access to it should still be readily achievable either directly from the lane or through the adjacent development. Both sites should therefore be able to accommodate the movement of large vehicles with limited additional highway infrastructure works or requiring use of new roads that are needed to support wider Cranbrook development in any event. Key considerations here include the fact these allocated sites will not necessarily require gypsy and traveller residents to drive large vehicles through residential areas. Also as both sites have the potential to be served by existing highway infrastructure, they will not be subject to possible delivery delays that could result whilst waiting for new roads to be built. Speedy development of gypsy and traveller sites is therefore a realistic aspiration (and expectation) at the two allocated sites.
- 6.7 Speedy gypsy and traveller site delivery is not only important in terms of meeting a pressing and acute need but also it is important in terms of giving clarity to future potential investors in housing over where new site provision is to be located. Early delivery of gypsy and traveller sites will ensure that anyone investing in, building, buying or renting a home at Cranbrook will do so in the knowledge of the existence of gypsy and traveller sites.
- 6.8 Under the allocated sites the gypsy and traveller provision will still retain proximity to the services and facilities that gypsies and travellers need, and which are to be provided at Cranbrook, but the sites will be at the fringes of Cranbrook separated from other residential areas by hedgerows, lanes and potential open space.

- 6.9 **In conclusion, it has been demonstrated that the two allocated gypsy and traveller sites in the Cranbrook Plan are needed and appropriately sited. The allocations are based upon evidence and existing adopted development plan policy. The SA and wider assessment work shows soundness and robustness of the allocated sites.**

Appendix 1 – Statement of Common Ground signed by East Devon District Council and the East Devon New Community Partners – Dated 17 June 2015



Local Plan State Common Ground 2015 inc G and T Ref.pdf

EDDC and EDNCp

*Statement of Common Ground:
Development at Cranbrook (Strategy 12)*

**EAST DEVON LOCAL PLAN:
CONSULTATION ON PROPOSED CHANGES**

**Statement of Common Ground
between EDDC and East Devon New Community partners:
Development at Cranbrook (Strategy 12)**

17 June 2015

David Lock Associates

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EDDC and EDNCp

Statement of Common Ground:
Development at Cranbrook (Strategy 12)

Common Ground agreed between:

East Devon District Council

East Devon New Community
partners

Signed by:

Signed by:



Stephen Lewis (Liberal,
Business + Democratic Politics)

(Partner)

On behalf of David Lock
Associates Ltd

Dated: 19 June 2018

Dated: 17 June 2015

David Lock Associates

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1 INTRODUCTION

- 1.1 In March 2015, East Devon District Council (EDDC) published a Revised Draft New East Devon Local Plan. The Revised Draft included a number of Proposed Changes to the Submission version of the Plan, November 2012. Those changes included the extension of the plan period and the consequent amendment to a number of the policies of the Plan including that relating to Cranbrook (Strategy 12).
- 1.2 In relation to Cranbrook the Revised Plan provides for:
- 8,300 new homes at Cranbrook within the existing consented scheme (approximately 3,500 new homes) plus defined expansions to the west and east of the town;
 - a further 1,550 new homes to be accommodated at Cranbrook through further expansion within the wider Cranbrook Plan Area but outside those areas designated as Neighbourhood Plan areas (a plan of those areas is included in the Plan); and
 - any intensification of the existing development which would also contribute towards the additional 1,550 dwellings to be provided at Cranbrook.
- 1.3 In total, therefore, 4,370 new homes are allocated at Cranbrook in Strategy 12 and in Strategy 2 (Setting and Distribution of Residential Development) - to be completed within the plan period.
- 1.4 Strategy 12, as amended, re-states the longstanding commitment to deliver Cranbrook in a phased and co-ordinated manner – not least in the delivery of new and necessary infrastructure.
- 1.5 This Statement of Common Ground (SoCG) has been prepared jointly by EDDC and East Devon New Community partners (EDNCp) in relation to development at Cranbrook. In preparing the Statement, EDDC and EDNCp seek to assist the Inspector in relation to his questions arising from the Proposed Changes consultation. Specifically, and primarily, this SOCG seeks to address:
- Q11 Is the area proposed to be designated as the Cranbrook Plan Area justified?
- Q6 Assuming 17,100 is the right number; does the Plan make adequate provision for its delivery?

2 ESSENTIAL CONTEXT

Planning Approach

- 2.1 Over the last decade there has been an unambiguous and robustly evidenced planning strategy for addressing development needs in the Exeter and East Devon Growth Area.
- 2.2 Originally captured in successive County Structure Plans, the strategy is embraced in the Adopted East Devon Local Plan 2006 and is carried forward in the New East Devon Local Plan. In essence the approach capitalises on the sustainability benefits of the co-ordinated development of major development and infrastructure in the West End of East Devon district.
- 2.3 Initially this was to comprise Cranbrook, Skypark, an intermodal rail freight facility and the Airport and associated infrastructure improvements including the Cranbrook station and the Clyst Honiton Bypass. A positive synergistic relationship between each, including the Airport, was envisaged.
- 2.4 Latterly the success of the approach has been expanded to embrace also development at Titebarn Green/Mosshayne and the Exeter Science Park.
- 2.5 At the heart of that approach has been the planning and implementation of a co-ordinated package of infrastructure delivery focussed initially on transport and highway infrastructure but expanded to include community and social infrastructure and more recently the regional Clyst Valley Park which will result in a substantial increase in green infrastructure provision and/or access in the West End of the District.
- 2.6 The provision of such infrastructure has involved the demonstrable co-operation and commitment of the many bodies, public and private sector within the Exeter and East Devon Growth Area.
- 2.7 Delivery within the West End has necessarily involved significant lead in times but has been highly effective. Within the wider West End Area (excluding Cranbrook) the delivery of key elements of infrastructure has already been achieved including: the Clyst Honiton Bypass; the upgrade of Junction 29 of the M5; the widening of the B3174. Further delivery is underway with the first phase of the Titebarn Link Road under construction and the remainder of the link road committed and to be completed.

IEDDC and EDNCp

**Statement of Common Ground:
Development at Cranbrook (Strategy 12)**

by 2018. Infrastructure delivery in the wider West End Area therefore has preceded development.

2.8 The Energy Centre for Skypark and Cranbrook has been constructed and is operational this assists in the Council's aim of enabling homes built at Cranbrook to meet the zero carbon standard.

2.9 In addition to Cranbrook, the Skypark and Science Park developments are now being progressively implemented and new occupations taking place and being secured.

2.10 In conclusion, following a significant gestation period, the realisation of the strategy for the West End of the District and hence for the East Devon and Exeter Growth Point has now achieved a strong momentum and is delivering highly sustainable development.

Delivery Mechanisms and Performance at Cranbrook

2.11 Cranbrook has been central to the implementation of the delivery strategy for the West End – both in underpinning the sustainability of the strategy but in particular in the delivery of key infrastructure.

2.12 To a greater extent than in the West End as a whole even, Cranbrook has secured the delivery of infrastructure ahead of development. For instance:

- before approximately 50 occupations had been achieved, the St Martins Primary School had been completed and open to residents of the community despite the trigger point in the S106 agreement being 500 occupations;
- at the same time the Younghayes centre (a multi-purpose community building) had been completed; and
- a comprehensive Combined Heat and Power scheme was in place to allow the first new homes to be connected to it.

2.13 The early implementation of infrastructure has fostered the sense of community at Cranbrook. In residents' surveys, high levels of satisfaction among residents are evident with many confirming that they have come to Cranbrook because of the community "offer" and evident infrastructure on the ground rather than planned at some future unspecified date. That, along with the substantial demand for private and affordable housing, has had a substantial positive effect on the rate of housing completions and occupations in Cranbrook.

EDDC and EDNCP

**Statement of Common Ground:
Development at Cranbrook (Strategy 12)**

2.14 The mechanisms by which implementation has taken place have involved close partnership working between the developers, EDDC, DCC, and a range of other partners.

2.15 On the basis of this partnership working, the following delivery milestones have been achieved (see Table 1).

Table 1 : Key delivery Timescales Achieved

Outline Planning permission	29 October 2010
RfM applications	January 2011
RfM approvals	April/May 2011
Infrastructure Start on site	June 2011
Housebuilding commences	April 2012
First occupations	Sept. 2012

2.16 From September 2012 to February 2015 (which includes, effectively, a standing start), a total of some 938 new homes were completed and occupied (including a substantial proportion of affordable housing).

2.17 The next phases of infrastructure delivery are at advanced stages of construction including:

- the Cranbrook railway station (to open in September 2015);
- the Education Campus including Secondary School (to open September 2015);
- the Cranbrook neighbourhood centre to include convenience store (to open summer 2015)
- the infrastructure to serve the town centre (completed summer 2015).

2.18 Other elements of infrastructure delivery are at advanced stages of planning:

- reserved matters application for sport pitches are submitted
- a reserved matters application for town centre road infrastructure to release the first town centre retail parcels is submitted;
- reserved matters application is submitted for road infrastructure to open up Phase 3 of the committed Cranbrook development.

2.19 A Draft Town Centre Design Code has been prepared and subject to stakeholder consultation. The Code provides for the delivery of other section 106 commitments plus other commercial facilities including:

- Town council offices and library;
- Health and Well being facility and leisure centre;
- Town centre retail facilities.

David Lock Associates:

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EDDC and EDNCP

*Statement of Common Ground:
Development at Cranbrook (Strategy 12)*

- 2.20 Instrumental in the successful delivery of key infrastructure at Cranbrook is the funding support principally of the HCA (but also other funding streams) which has enabled delivery to take place with loan repayments following in tandem with housing completions. This has provided a highly effective means of delivering sustainable development at Cranbrook.
- 2.21 To date two substantial funding support packages have been agreed and entered into.
- 2.22 The first phase supported the delivery of infrastructure elements such as the initial main transport route through the first phase of Cranbrook's development, the construction of the Claydon Horizon Bypass and Younghayes Centre.
- 2.23 The second infrastructure funding package entered into by the partners and HCA has seen the delivery of the town centre infrastructure and the Education Campus.
- 2.24 The success of the model is evidenced not only by the infrastructure being there and the high levels of resident satisfaction in Cranbrook, but the high profile of Cranbrook on the national political and planning stage (evidenced not least by repeated ministerial visits).
- 2.25 Of particular relevance to the East Devon Local Plan Examination is the commitment given by the HCA to enter into a third phase of infrastructure funding directly related to the delivery of the expansion of Cranbrook. In principle a further £20 million of infrastructure funding is already committed to support the expansion of Cranbrook.
- 2.26 The clear evidence of Cranbrook to date is that its future expansion, so long as sustained by infrastructure delivery, will be:
- supported at national level by substantial ongoing investment in infrastructure;
 - characterised by continuous, high rates of private housing delivery underpinned by infrastructure delivery (already in place – such as the secondary school - and to come), and by high levels of housing need in both the private and affordable housing market sectors; and
 - accompanied by accelerated investment in commercial retail and employment uses in the town centre consequent upon the momentum provided by the plans for the town's expansion.

Supporting Evidence and Sustainability Appraisal

- 2.27 The expansion of Cranbrook beyond the current committed development (of some 3,500 new homes) has featured prominently in the preparation of the New East Devon Local Plan – from its earliest stages.
- 2.28 The Submission Plan, in 2012, sought to accommodate 6,000 new homes at Cranbrook by 2026. This was consistent with the capacity that was considered to be likely to be deliverable in that time frame i.e. by 2026.
- 2.29 Beyond 2026 the submitted version of the Plan set out the expectation that Cranbrook would develop further beyond 2026, by some 1,500 additional new homes, and that this would be in a south west direction (south of the former A30).
- 2.30 The Revised Draft of the Local Plan now includes specific provision for some 1,550 additional dwellings within the new extended Plan period – within the Cranbrook Plan Area – albeit, at this juncture, the location for that additional development is not determined and EDDC have embarked on a major planning exercise to establish the same.
- 2.31 Plans for the expansion of Cranbrook to between 7,500 and now 7,769 new homes are based on a carefully assembled evidence base.
- 2.32 Consideration of the expansion options at Cranbrook commenced within the initial East Devon LDF Issues and Options Report in December 2008 when all options for the expansion of Cranbrook, in all directions, were considered.
- 2.33 The refining of options for the expansion of Cranbrook progressed slowly with all options being promoted through the Local Plan or SHLAA process being considered in sustainability appraisals published in October 2012 (*“Sustainability Appraisal/SEA: Addendum Report Covering West End and A3052 Corridor Sites”*) (CD/Gen021) and then in July 2013 (*“East Devon Local Plan: Submission Version – Sustainability Appraisal Addendum, LUC”*) (CD/Gen009).
- 2.34 Each assessment included consideration of expansion options to the west, east and south west of Cranbrook (the latter south of the B3174). Each of these options is controlled and can be delivered by the EDNCp. It is however acknowledged that there are other developer interests at Cranbrook. These have in the past delivered housing at Cranbrook albeit at a much smaller scale than the EDNCp. For example

EDDC and EDNCp

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Wain Homes recently delivered 55 dwellings at Cranbrook on land outside of the EDNCp's control. Other developers may continue to deliver housing at Cranbrook which would contribute to meeting the housing numbers for Cranbrook proposed in the draft Local Plan.

2.35 In addition to the EDNCp's land interests the assessments considered a number of small sites along with a more significant option south of the B3174 and north of Rockbeare (site W123).

2.36 For ease of reference the summary assessments of those sites controlled by EDNCp are summarised in Table 2 below:

Table 2: Summary Sustainability Appraisal Assessments – October 2012

Location	"Summary of Key Grounds for Allocating or Not"
Cranbrook West	The western extension of Cranbrook (on land that aligns with the New Community Consortium land ownership/options) will help accommodate part of the extensive expansion planned for the new community in a manner that provides for new development close to existing facilities and 'in-fills' between major physical features, including the old A30 to the south, Exeter to Waterloo railway line to the north and Station Road (and development at/along this road to the west).
Cranbrook East	The eastern extension of Cranbrook (on land that aligns with the consortium land ownership/options) will help accommodate part of the extensive expansion planned for the new community in a manner that provides for new development close to existing facilities. The southern boundary is formed by the old A30 and the northern by the Exeter to Waterloo railway line. At the eastern edge of the proposed extension the land rises reasonably sharply and this was deemed to be an appropriate position in landscape terms to establish an easterly edge to the Cranbrook. This easterly edge will also ensure there is retention of an open undeveloped area between Cranbrook and Whimple (the open area is designated as a Green Wedge in the local plan).
Cranbrook South West	The Local Plan indicatively shows longer term (post 2026) expansion of Cranbrook in a south-westerly direction. Land is, however, not allocated for development. A south westerly expansion (although it goes south of the old A30) will 'in-fill' to some degree the area between Cranbrook and other major land use, esp the airport, Skypark and the combined heat and power plant. Expansion in this direction will avoid coalescence/ or near coalescence with existing settlements, avoiding Green Wedge development, and will allow for the longer term expansion of the new community.

- 2.37 In the July 2013 *East Devon Local Plan: Submission Version – Sustainability Appraisal Addendum, LUC* (CDPGen009), updated and where necessary revised site appraisals were undertaken and reported – ‘to ensure that the SA assumptions are applied consistently (in the West End), in line with other site-based appraisals for the market town development site options’ (1.21).
- 2.38 It may therefore be concluded that the Local Plan process has undertaken a thorough assessment of the expansion options around Cranbrook – to the east, west and south west but also to elsewhere in the Cranbrook Plan Area.
- 2.39 The above mentioned assessments have confirmed that expansion to the west, east and south west are suitable for meeting the housing needs of the district and Exeter and East Devon Growth Point – having regard to the range of matters assessed. The assessments accept that the mitigation of any impacts can be designed in at the design stage. The master planning exercise currently underway will have regard to the earlier assessments and will also test the outcomes thereof.

Current Planning Applications

- 2.40 A number of planning applications have been lodged for the expansion of Cranbrook, following consultation with the local communities in the autumn of 2014.
- 2.41 Primarily these comprise applications by the East Devon New Community partners as follows:
- Cranbrook West
15/0045/MOUT: The expansion of Cranbrook comprising up to additional 820 residential dwellings, one 1-form entry primary school, a cemetery and associated building, sports and recreation facilities including children’s play, an extension to the country park, green infrastructure (including open space), community uses (including non-residential institutions) and cemetery. Access from former A30, landscaping, engineering (including modelling and drainage) works, demolition, associated infrastructure and car parking for all uses. All matters reserved except access.
- Cranbrook East
15/0047/MOUT: Up to 1,750 residential dwellings, one 2-form entry primary school, local centre comprising up to 1,000sq m of A1 uses plus A2, A3, A4, A5 uses and up to 1,250sq m B1 Business use. Sports and recreation facilities including children’s play, green infrastructure (including open space), community uses (including non-residential institutions), assembly and leisure, landscaping and allotments. Access from former A30, engineering (including ground modelling and drainage) works, demolition, associated infrastructure and car parking for all uses. All matters reserved except access.

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Cranbrook South

15/0046/MOUT: The expansion of Cranbrook comprising up to an additional 1,550 residential dwellings, 40,000 sq m of employment (B1, B2, B8), one 2-form entry primary school, a local centre comprising of up to 1,000sq m of A1 uses plus A2, A3, A4, A5 uses and up to 1,250sq m B1 business use. Sports and recreation facilities including children's play, green infrastructure (including open space), community uses (including non-residential institutions), assembly and leisure. Access from former A30, landscaping, allotments, engineering (including ground modelling and drainage) works, demolition, associated infrastructure and car parking for all uses. All matters reserved except access.

- 2.42 In addition, two applications for the Cranbrook area are made by other promoters as follows:

Land at Farlands within Eastern Expansion Area

Development of up to 250 houses, commercial uses, public open space and associated infrastructure (outline application with all matters reserved) (14/2945/MOUT); and

Land South of B3174 and North of Rockbeare

Outline application (all matters except access reserved) for demolition of existing agricultural buildings and development of up to 250 dwellings, a local centre providing commercial floorspace of up to 600 sqm (use classes A1,A3,A4 & B1), community building/cafe (use class D1 & A3), public open space/green infrastructure and associated works (15/0371/MOUT)

- 2.43 The site of the application in relation to Land south of the B3174 and North of Rockbeare is located within the designated Rockbeare green wedge and as proposed would encourage settlement coalescence contrary to Strategy 8 – Development in Green Wedges of the Draft Local Plan. It is not therefore considered by EDDC as an appropriate residential development in its current form.
- 2.44 In total the applications seek consent for permission for more residential development than that sought through Strategy 12 of the Revised New East Devon Local Plan. In total consent is sought for some 8180 new homes (including 3,500 within the existing consented scheme plus 55 homes by Wain Homes within the committed Cranbrook scheme.

3 PRINCIPAL MATTERS OF AGREEMENT

Application Proposals and Master Plan Process

- 3.1 EDDC has appointed consultants to consider the vision for Cranbrook and to develop master planning principles for the development of Cranbrook. EDNCp are fully engaged in that process.
- 3.2 The master planning commission includes a series of technical workshops on the following topics:
- Transport
 - Green infrastructure and landscape
 - Economy
 - Energy and climate change
 - Health and well being
 - Leisure and culture and community
- 3.3 Stakeholder engagement will form part of that process with workshops arranged for 22/23 June and 15/16 July 2015.
- 3.4 The timetable for the masterplanning commission is attached as appendix XX.
- 3.5 In addition to the master planning commission, EDDC and EDNCp are progressing a parallel but linked process, facilitated by CABE, to progress the EDNCp planning applications for the expansion of Cranbrook to the west, east and southwest.
- 3.6 It is agreed between the parties that:
- the timely outcomes of the EDDC master planning process, including its consideration of technical issues, will inform the planning applications;
 - an additional independent design review of the three applications will be undertaken by CABE; and
 - the outcomes of the EDDC master planning process and of the independent design review process are likely to result in amendments to the applications and/or the need for new applications.
- 3.7 In terms of timetable it is the intention of the parties to ensure that the outcomes of the master planning process, and the resolution of issues raised in consultations, will enable the applications to be amended or resubmitted (if and as necessary) in a

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timely fashion to allow EDDC to consider each application at Committee before the end of 2018.

Consultation on Application Process and Issues Arising

3.8 The applications were validated on 10 March 2018. Responses have been received on the three EDNCp proposals from many of the statutory consultees.

3.9 In parallel with the master planning process, EDDC and EDNCp, facilitated by CABE, are embarked upon a process of review of the consultation responses and address the issues raised as necessary. The Technical Groups that form part of EDDC's master planning commission will contribute also to this process of review.

3.10 In summary EDDC and EDNCp have identified a range of matters through the consultation process to date and have agreed to progress matters as set out below. Both parties consider this to be a normal process of considering the more detailed proposals set out in a planning application prepared in response to the higher level planning policy put in place by the relevant District Council – and in this case, specifically, the revised Draft East Devon Local Plan and Strategy 12

Further Technical Information

3.11 A number of responses on the application proposals have sought more detailed information in relation to a number of technical issues. It is agreed that EDNCp will prepare the additional information requested which will be discussed with the relevant consultees and formally submitted in due course in response to a formal Regulation 22 request from EDDC to provide further information.

3.12 Examples of such more detailed work which are underway includes:

- the completion of additional trial trenching in each of the expansion areas (trenching well advanced in accordance with WSI agreed with the County Archaeologist);
- the preparation of safety audits for the access junctions (underway);
- the refinement of the baseline conditions within the Transport Assessment (underway and subject to regular discussion with Devon County Council);
- the expansion of the assessment of the landscape and visual impacts of development on the National Trust property at Killerton House to include historic aspects notwithstanding the conclusion of English Heritage that "the distance to Cranbrook makes these views of potentially lower sensitivity in relation to Killerton's setting" (underway).

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- the preparation of a more detailed air quality and odour assessment;
- adoption of alternative assumptions within flood plain modelling (updated modelling complete and ongoing discussions with the Environment Agency).

Airport related issues

- 3.13 One of the key elements of the strategy for the West End of the District is the opportunity for synergy between developments including between the Airport and Cranbrook. Those benefits relate not only to the juxtaposition of homes and jobs but in particular the benefits that are planned in terms of surface access to the airport – including, importantly, from the rail station at Cranbrook. These are important sustainability benefits.
- 3.14 Consideration of issues relating to the Airport was taken into account in the development of the Revised New East Devon Local Plan.
- 3.15 It is agreed that no new housing is proposed either in the Local Plan or in the application for the expansion of Cranbrook to the south within the 57 dB contour associated with airborne noise at the Airport.
- 3.16 Rather any concerns raised in relation to the airport relate primarily to the potential for complaints relating to ground based noise at the airport including noise related to engine testing at the airport, which takes place over short durations, but is the loudest noise source when it occurs. The most significant historic concern of engine testing taking place at night is now understood to take place at the airport only in emergency. EDAL also refer to noise relating to helicopters associated with the police and air ambulance facility on the airport site in its consultation response on the planning application.
- 3.17 Airport related issues have been considered, in the context of the existing Cranbrook development. On a precautionary basis mitigation has been considered in the nearest newly constructed properties. In practice normal thermal double glazing delivers substantial mitigation in excess of that required.
- 3.18 With regard to the expansion of Cranbrook, airport related issues have been considered in the development of the policy and do not present a show stopper in terms of development south of the B3174 although the scale, form and distribution of uses within this area will to some extent be shaped by these issues.

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3.19 This is consistent with the Airport's consultation response on the application to the south of the B3174. Instead the Airport seeks to engage in further assessment and invites consideration of appropriate measures to limit the impact of noise from the Airport in relation to sensitive receptors. The Airport concludes in relation to application proposals south of the B3174: 'Appropriate mitigation measures must be implemented by the developer sufficient to counter the inevitable complaint from residents ... whether such measures are dealt with through conditions or resolved between the developer and Airport direct ... will be for the LPA to discuss and advise'.

3.20 Both EDNCp and EDDC are engaged in regular discussions with the Airport. Through those discussions it is anticipated that a mutually agreed position on airport related issues will be reached in relation to the Airport, EDDC and EDNCp. This may include provision for further mitigation (including mitigation proposed on a precautionary basis). The options for mitigation that can be considered, if necessary, include:

- the definition of the southerly extent of residential uses within a south west extension and the proximity to the airport boundary;
- the disposition of more sensitive uses within the built extent of development;
- the detailed layout of buildings having regard to the mitigating effects of buildings closer to any noise sources;
- the use of appropriate mitigation within those properties most closely related to the airport.

Landscape Issues

3.21 In developing the Local Plan policies for Cranbrook, it was recognised that expansion of Cranbrook west, southwest and east, could be accommodated outside protected landscapes of any type.

3.22 The assessments also concluded that expansion to the south west will avoid coalescence/or near coalescence with existing settlements, and will allow for the longer term expansion of the new community.

3.23 Although accepting that there are no high level show stoppers in relation to landscape matters it is agreed that the expansion of the development to the southwest and to the east is visible from a number of vantage points and these need to be carefully considered.

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3.24 EDDC and EDNCp have agreed to conduct a review of the application proposals and in particular the local sensitivities of the more detailed proposals that are now presented in the applications. The further assessment may conclude that development has been proposed too far south and east so the extent of development may need to be drawn back. In this event EDDC and EDNCp are committed to working together to maximise the development potential of the allocated consortium land and the land included in the current south west expansion proposals, but acknowledge that land elsewhere within the Cranbrook Plan area may need to be brought forward to meet the proposed housing numbers identified for Cranbrook in the draft Local Plan. It may alternatively conclude that by employing generous planting regimes at an early stage of development a high quality landscape structure can be developed that mitigates impact and provides a highly attractive green infrastructure network. Clearly a combination of the two measures may be necessary.

Transport issues

3.25 Transport issues have been integral to the development of Cranbrook, Skypark, the Science Park and other developments east of Exeter to date. The approach has led to the successful co-ordination of necessary infrastructure delivery, generally in advance of requirements, and the expansion of sustainable transport modes.

3.26 The provision of such infrastructure has been led by the County Council, working closely with Highways England, and other parties including the developers. EDNCp delivered the Clyst Honiton bypass, for instance.

3.27 The planned co-ordination and delivery of transport infrastructure continues in relation to the proposals in the Revised New East Devon Local Plan. Already DCC and Highways England are comfortable that commitments are in place to deliver 6 500 dwellings in the West End of the District.

3.28 Moreover DCC is progressing with proposals that will deliver further investment in sustainable transport modes which is identified as unlocking the additional development capacity that is proposed beyond 6500 dwellings. This is a matter that has been highlighted and progressed recently at the Exeter and East Devon Growth Point Delivery Board which includes all key stakeholders. Appendix 2 includes the relevant paper which identifies some of the investments that are being considered and progressed in relation to the expansion of sustainable transport modes.

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3.29 EDNCp and EDDC continue to work closely with DCC and Highways England on these issues. Should a proposal come forward following more detailed feasibility study then EDNCp would agree (subject to final confirmation) to reserve a site within the master plan for the eastern expansion of Cranbrook for a second rail station.

Flooding and Drainage Issues

3.30 While the need for additional modelling is being addressed it is agreed that built development would not take place within the floodplain, other than essential infrastructure.

3.31 It is further agreed that there are very limited areas subject to flood risk in the west and south west expansion applications (almost none in the south west) and as such areas at risk of flooding do not present a significant constraint to the master plan process.

3.32 To the east there are more extensive areas at risk of flooding albeit that their extent is generally well understood (having regard to the EA flood mapping and the application documentation). The areas likely to be at risk of flooding do not constrain the ability to deliver the capacity of the eastern expansion area as set out in policy Strategy 12.

3.33 South West Water has confirmed that there are no foul water issues relating to expansion.

Other Master Plan Issues

3.34 The consultation responses on the applications, and in one area the inspectors outstanding questions, have raised a number of issues to be addressed in the refinement of the application proposals for the expansion area.

3.35 To address a deficiency in the submitted Local Plan, EDNCp have agreed to include a site or sites suitable for 30 gypsy pitches within the expanded area of Cranbrook. EDNCp agree to make available one or more sites to EDDC within the expansion area within five years.

3.36 Other issues raised during consultation include among other issues the following:

- number and distribution of primary schools;
- opportunity to create a more focussed provision of sports facilities around a centralised hub;

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- location of play areas relative to residential areas;
- relationship of new housing with existing housing on Station Road
- location of allotments
- need (or not) for any local service facility within the western expansion;
- arrangements for pedestrian and cycle linkages including connections with existing infrastructure and/or residents
- need for, scale and location of employment;
- relationship of drainage basins to play areas; and
- setting of the listed building Treasbears Farm.

3.37 None of these matters raised in principle objections to the expansion proposals. They will each be considered and addressed as appropriate through the ongoing consultation process and be incorporated within amendments to the applications.

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4 PRINCIPAL AREAS OF DISAGREEMENT

4.1 There are limited a limited number of areas where there is disagreement between EDDC and EDNCp. These are listed below and will be addressed separately in each parties statements/representations:

- a. the need for a DPD (EDDC) or not (EDNCp);
- b. the inclusion of two fields within the eastern allocation; and
- c. the extent and mix of employment uses.

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Appendix 2 - Scoring system used in the Sustainability Appraisal

In the SA report there are a number of sustainability objectives that **the** strategic approach and policy **is assessed against**, in the varying iterations of the plan ~~is assessed against~~. Table 2.2 on page 13 of the SA report introduces these SA objectives and they are used consistently through the overall plan appraisal work.

To understand more about the objectives and the ‘scoring’ system used, as well as the methodology and assessment and the wider context of appraisal the full SA report should be referred to in its totality.

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.
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.

Against the objectives there are scores attributed to likely sustainability impacts. The scores (symbols used) are tabled below and feature in the table on page 15 of the SA report.

++	The option or policy is likely to have a significant positive effect on the SA objective(s).
++/-	The option or policy is likely to have a mixture of significant positive and minor negative effects on the SA objective(s).
+	The option or policy is likely to have a positive effect on the SA objective(s).
0	The option or policy is likely to have a negligible or no effect on the SA objective(s).
-	The option or policy is likely to have a negative effect on the SA objective(s).
-/+	The option or policy is likely to have a mixture of significant negative and minor positive effects on the SA objective(s).
--	The option or policy is likely to have a significant negative effect on the SA objective(s).
?	It is uncertain 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 both minor or both significant positive and negative effects on the SA objective(s).

Appendix 3 – Amendments Proposed to Cranbrook Plan Sustainability Appraisal

The text and tables below are proposed to form an amended chapter 10 of the SA report. It should also be noting that the SA overall, at plan adoption, could need further updating and amendments in respect of any Main Modifications to the plan.

In respect of additional commentary on suitability for gypsies and travellers some of the sites assessed, on account of being large in size, offer many alternative plot options or variations within which a gypsy or traveller site could be located. This SA work does not, however, look at and assess every single plot option on any given site, rather it concentrates on the potential suitability of each site in general, albeit in commentary there are some observations that relate to certain parts of sites, as opposed to the site as a whole, especially if or where larger sites may have distinct varying characteristics across their extent.

In this appendix proposed changes to chapter 10 of the SA are set out in the following format:

- New text is shown as underlined and in red.
and
- Deleted text is shown with a single ~~strike-through~~.

10 SA of Alternative Site and Land Development Options

- 10.1 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 earlier chapters. This chapter also explicitly cross-references back to the preceding chapter that assessed and examined the Publication Cranbrook Plan policies that allocated or identified specific areas of land for development or specific purposes. ~~It is stressed however, that this~~ This chapter of the appraisal is primarily concerned with in principle suitability of land for development as opposed to any specific policy wording that may be attached to or accompany any provision for development that may be made. The one exception to this is, however, in respect of site suitability to accommodate gypsies and travellers.
- 10.2 This chapter has been adapted from a chapter of the appraisal that originally featured at the Preferred Approach stage of plan making. At and prior to the Preferred Approach stage of plan making various land areas and sites had been promoted by land owners and agents for development. It was identified as important to consider all promoted options, and potential additional options as well, through the sustainability appraisal process.
- 10.3 Appraisal at the Preferred Approach stage of plan making indicated that the areas of land that were identified for development through the 2017 Masterplan work could be appropriate and suitable for development. In the context of site suitability (and this applies to the Preferred Approach stage of Plan making and also the now Publication stage) it is 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.
- 10.4 The appraisal work at the Preferred Approach stage of plan making reinforced the general conclusions of the suitability of the Scenario 4 approach to development; site by site assessment should be seen in this context.

Site by Site Assessment at Publication Stage of Plan Making

- 10.5 The map in this chapter shows 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 commentary of appraisal for each site comparing the identified site against the SA objectives.
- 10.6 In some cases sites identified in this chapter are sub-divided to reflect the fact that differing parts of larger site areas have differing characteristics or suitability for development and in the Cranbrook Plan are identified for differing uses.
- 10.7 Areas selected for assessment are based on examining existing Local Plan land allocations and also land areas that have 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 and also includes some extra areas identified by officers that could offer scope for development.

- 10.8 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 may be noted in appraisal.
- 10.9 There are a number of areas of land around Cranbrook that have **not** been assessed as part of this SA work. In some cases land close to Cranbrook that is in productive developed use or is being-developed separately from Cranbrook is not assessed, the most significant examples (in size terms) are the Skypark Business Park, the major freight depot and Exeter Airport. Extensive floodplain areas of land have 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.
- 10.10 In respect of land areas on the edges of Cranbrook that have not been assessed the following observations are made:
- **Land to the west of Station Road** – the local plan western allocation sites have been appraised as have a number of small sites adjacent to London Road (sites C, D, E, W, U, V, W Z1 and Z2 on the map). However land to the west of these small sites falls in a floodplain and this is seen as an absolute constraint to development and so assessment has not gone further westward.
 - **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 which runs to Broadclyst – given site letter F on the map). Much of the land north of the railway line is in a 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 development. Furthermore other than where noted and appraised 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 have 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 part of G, 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 for the most part not been promoted for development and it should be noted that, in part, land to the east rises

quite sharply and is of landscape prominence and also, as you go eastward, becomes increasingly remote from Cranbrook facilities, either existing or planned.

- **Land to the south of London Road** – all land areas south of London Road, that abut or are close to the road, have been appraised. Land further south, has, however not been assessed. Much of the land south of London Road forms the operational area of Exeter airport and to the East of the airport is Rockbeare village. Whilst sites have previously been promoted for development at and close to Rockbeare village they are some distance from Cranbrook, they physically relate to the village rather than Cranbrook and the village itself has been subject to consideration for development through the East Devon Local Plan adopted in 2016 and the East Devon Villages Plan adopted in 2018.

- 10.11 By clear intent and design, and unless of a significant scale, prominence or importance, assessment does not look into detailed site specific matters including such issues as possible access arrangements or detailed site specific features that may be particularly worthy or important to protect or which may place localised constraints on development. It should also be noted that assessment is typically based on appropriateness for development in general, with housing assumed to be the predominant land use, this is especially so for smaller sites, though as highlighted earlier specific comment is also provided on potential appropriateness for accommodating gypsies and travellers. For the largest sites assessed, the work assumes a mixture of housing and other facilities (such as schools and open spaces with these other facilities being needed or justified wholly or largely on account of housing provision (allocation policies, notably CB2 to CB5 inclusive, provide for mixed use development on allocated sites). 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.
- 10.12 Site assessment is primarily geared around general site suitability for development (typically housing). However where the Cranbrook Plan polices, as given spatial expression through the Policies Map, specifically allocate or identify an area of land for a defined use or range of uses, this is referred to in the commentary on the site.
- 10.13 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 typically easiest and most credibly achieved on larger 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, including in a timely manner. This factor is reflected in SA appraisal of sites (though may 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 (especially the smallest 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.
- 10.14 In the tables in this site specific stage of assessment most of the potential impacts that could result from site development, as measured against the SA objectives, are

commented on. This is especially so where impacts are identified as potentially being a significant positive benefit in nature or a significant negative. The scorings recorded are typically produced on the assumption of no mitigation though where mitigation could reasonably be expected then this is reflected in the scorings noted. Commentary may address scope or appropriateness for mitigation.

10.15 There are a number of general observations that are made about the way that scores are attributed to sites, these are:

- **SA Objective 1 - housing** – all of the sites appraised are done so on assumption of accommodating an element of or totally being for housing development. On the basis that they will accommodate housing they are all score a positive effect against SA Objective 1. However for the largest sites, those that offer scope to accommodate the highest levels of levels of new housing, a significant positive impact is recorded. The significant positive is a product of the larger numbers of houses these sites will deliver and specifically applies to sites A1 and A2, B1 and G. In respect of gypsy and traveller accommodation this assessment does not hold true and so comparative differences identified for housing, between a 'significant positive' and just a 'positive' impact, are not applicable.
- **SA Objectives 8 - historic environment, 9 - landscape character, 13 air, soil and water, 17 Waste** – in some cases there are particular features or reasons that explicitly inform site assessment but on a general level the larger sites, on account of their size, if nothing else, will frequently have significant negative impacts, because they will contain more development, whereas smaller sites, because if nothing else they are smaller, will have lesser adverse impacts.
- **Proximity to facilities** – in a number of cases assessment is based on proximity to facilities and specifically ease of walking. The SA of the East Devon Local Plan³ established the appropriateness (see paragraph 5.6 of that assessment) of an up to 600 metre walking distance to facilities. This walking distance threshold, typically from a central part of any assessed site, is used to inform assessment work where ease of pedestrian access is seen as a relevant or important consideration.

10.16 It should be noted that the map in this chapter of the appraisal originally featured in the Preferred Approach appraisal report. At the Preferred Approach stage of plan making the sites assessed were identified in red text and red outline. In this new version of the map the red colour and site numbers have been retained. These red sites have, however, been augmented by a number of additional new sites that are subject to appraisal at this Plan Publication stage of assessment work, these new sites are shown in blue. Through this appraisal at Publication stage of plan making a more comprehensive review of sites, than that undertaken before, has been completed.

³ See: <http://eastdevon.gov.uk/media/1515306/psd2015w-2-sareportincpropchangesaug2015.pdf>

Key considerations in respect of sites for gypsy and traveller accommodation

- a. The SA tables in this section of the appraisal specifically consider potential suitability of sites for gypsy and traveller accommodation.
- b. In respect of the SA work for gypsy and traveller provision it should be noted that for the most part the characteristics of sites that may make them suitable for regular bricks and mortar housing will also apply to gypsy and traveller site provision. In both cases sites are providing homes for people to live at. However, there are some particular points that are worth highlighting and these are reflected in the SA commentary:
- **Vulnerability to noise pollution** (SA objective – 6) gypsy and traveller caravans and other associated accommodation will often have very poor sound insulation and so occupants can typically be expected to suffer worse impacts in noisy environments than residents of bricks and mortar housing.
 - **Lesser landscape impacts** (SA objective 9) – gypsy and traveller sites are nearly always single storey developments whereas new bricks and mortar housing (note Cranbrook as built at present) are typically two or more stories high and then frequently will have pitched roofs. As a consequence gypsy and traveller sites will typically be easier to screen behind vegetation, they will often more readily sit below folds in the land, and can frequently be demonstrated to have lesser landscape impacts.
- c. In reviewing site options to accommodate gypsies and travellers there is a consideration that relates to the physical size of any assessed area of land. One matter is ensuring that sites are big enough to accommodate the level of planned development. The Council has an adopted Gypsy and Traveller Site Design and Layout - Supplementary Planning Document (SPD), see: <https://eastdevon.gov.uk/media/2016282/final-doc-gypsy-and-traveller-site-design-and-layout.pdf>
- d. This SPD advises on appropriate minimum sizes for sites highlighting a figure of 500m² per pitch; a pitch would typically accommodate a family. This size equates to:
- 0.25 hectares for 5 pitches;
 - 0.5 hectares for 10 pitches; and
 - 0.75 hectares for 15 pitches.
- The SPD suggests an upper limit of 15 pitches on a site though for the Cranbrook Plan the Council has moderated this to a suggested maximum of around 10 pitches for any site. It should also be noted that the SPD also includes a wealth of additional information on gypsy and traveller site provision and development.
- e. In respect of the two sites proposed for allocation at Cranbrook, they are larger than the SPD minimum sizes. The site in Treasbeare site is larger due to the topography of the site potentially necessitating greater space being required for vehicle manoeuvring and also allows space for landscaping to help mitigate landscape and visual impacts. In Cobdens the allocated site is larger to allow space for the grazing of animals.

- f. Highway access is also a relevant and important consideration in respect of suitability of sites for gypsy and traveller use. Gypsies and travellers may need to move larger vehicles on and off site, often for business purposes, on a regular basis. Easy access on to main roads can therefore be an important consideration, whereas access to gypsy and traveller sites that involves extensive use of narrow country lanes or that creates a need to travel through residential estates is likely to be less preferable. Furthermore engagement work with gypsies and travellers has highlighted a desire for and importance attached amongst the community for good access to main roads.
- g. The Gypsy and traveller community expressed a preference, at preferred approach stage of plan making, for sites to be at the edges of Cranbrook locations and a desire not to be hemmed in or overlooked by bricks and mortar housing. Gypsy and traveller site provision may, therefore, be expected to work better at the fringes or outer edges of Cranbrook development (or blocks of development) rather than in more central parts of the town, or in a central part of any strategic allocation or housing estate or abutting existing housing.
- h. Good pedestrian access to facilities is especially important for the gypsy and traveller community. Many gypsy and traveller families are amongst the most socially and financially deprived people in England. Gypsies and travellers often have:
- significant physical health problems, including much higher than average infant and child mortality;
 - mental health conditions;
 - reduced life expectancy and chronic long-term conditions;
 - poor educational attainment; and
 - high unemployment levels.
- These factors are associated with poor access to healthcare and education, and lack of consistency of access, often as a result of living on poor quality and badly located unauthorised sites (due to a lack of permanent provision) and frequently having to move on.
- i. In consultation that informed the Cranbrook Plan⁴, gypsies and travellers overwhelmingly wanted permanent pitches from which to travel and which would enable children and the elderly to receive a full education and medical care. It is essential, therefore, that new sites are provided and that they are provided in locations which are not remote from or with poor or limited access to services. As a basic test of appropriateness, gypsy and traveller sites should have good pedestrian access to facilities, such as those that may be found at existing or planned neighbourhood centres, the town centre and at schools. It is also recognised that there is much to be said for promoting opportunities for social engagement and potential for integration between all the differing groups in society and therefore, when it comes to accommodating gypsy and traveller sites, proximity to other people, without necessarily being ‘on-top of them’, is seen as very important.
- j. There are a number of land parcels, as promoted by owners or otherwise identified as appropriate for consideration under this SA, that are on the smaller size and that are not

⁴ <https://eastdevon.gov.uk/planning-libraries/cranbrook-plan-pa-2017-18/eddcsummarygypsyandtravellerresponses.pdf>

under the control of a landowner, single house builder, agent or consortium. In some cases these smaller sites may be just too small and in other cases may score well against the SA objectives and hence could have good apparent technical suitability for gypsy and traveller use, but it is unlikely that they will be made available by landowners. In calls for gypsy and traveller sites there has been no land owner expressions of interest in site provision at Cranbrook.

- k. Gypsy and traveller sites generally have a lower commercial value when compared against values for open market housing and this can be expected to impact on a landowner's desire to bring sites forward for gypsy and traveller use. In simple and crude financial terms (at least for anyone wanting to maximise the amount of money they can make) owners may sit on land allocated for gypsy and traveller use (declining to accept a lower financial return) and not release it for site provision in the hope that in the longer term they will secure the much higher value available from open market bricks and mortar housing on the site. In practice this clearly favours making gypsy and traveller provision part of bigger/strategic sites rather than smaller sites.
- l. In simple terms the bigger the overall land interest of a landowner, the lower the percentage of overall development land required for gypsies and travellers. The consequences of this is a lower comparative percentage financial impact on total commercial values or returns. This principle helps to guide where new sites could best be accommodated and is a valid planning consideration that those producing the Cranbrook Plan may attach weight to in the policy making process of selecting sites for gypsy and traveller allocation.

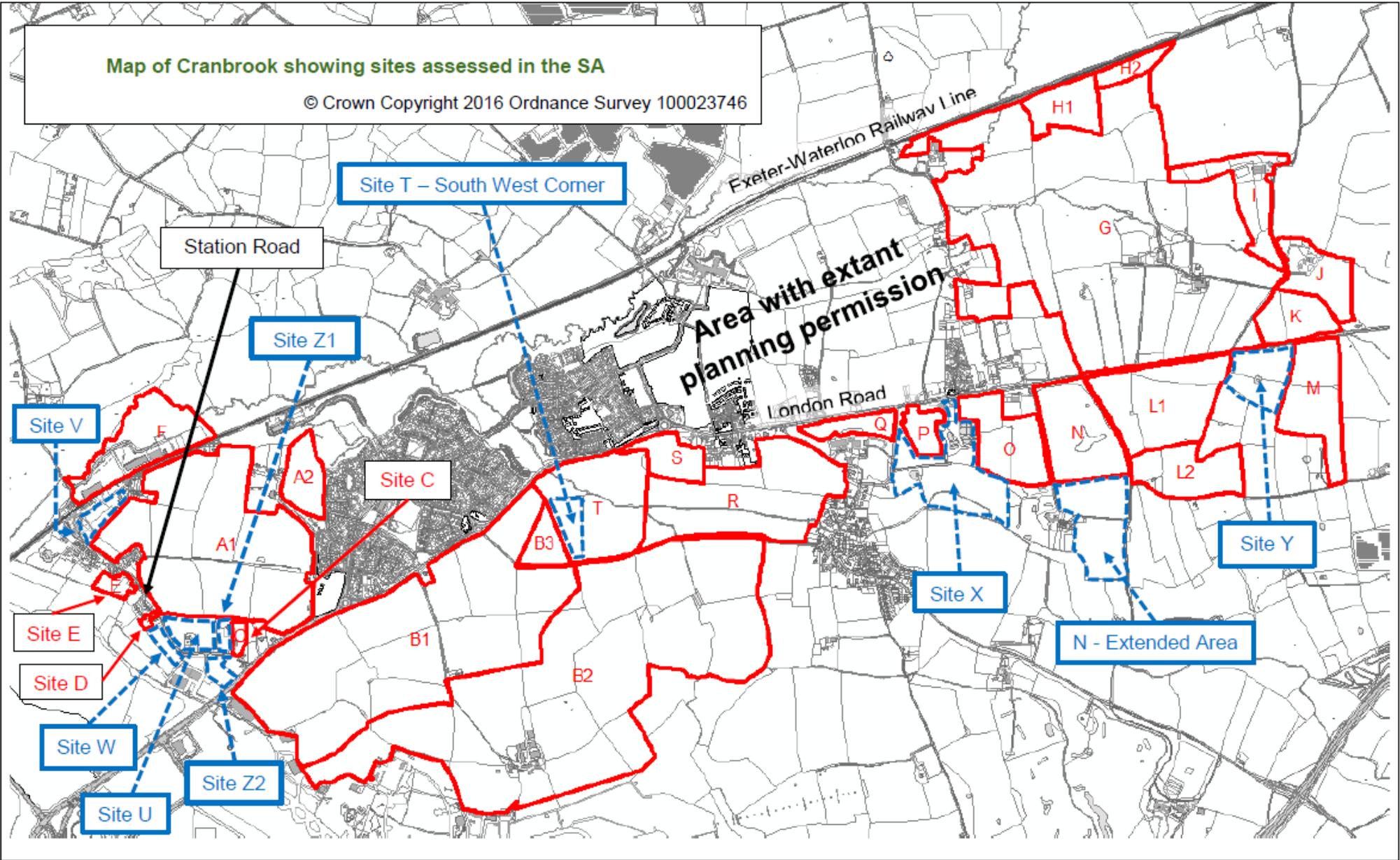


Table 10.1 - SA appraisal of alternative site development options

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 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	
Site A1	++	++	++	++	0	-?	+	-?	-	0	0	++	-	++	0	0	--	+	+	+	
<p>Sites A1 was, in earlier work appraised alongside and in combination with Site A2. Site A2 is however now identified as open space in the Cranbrook Plan and current proposals will see it come forward for this use. In this appraisal at Publication stage the assessment applies to A1 only (separate appraisal of A2 has not been undertaken). Development of land to the west of the original built area of Cranbrook, which site A1 achieves, accords with broad positive approaches to achieving sustainable development set out in earlier work in this appraisal.</p>																					
<p>Appraisal of this land area shows that it 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 substantial levels of housing 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. Given proximity to facilities the site scores significant positive benefits against SA objectives 1 – Housing, 2 - Community services, 3 - Education and skills, 4 – Health, 12 - Sustainable Transport and 14 - Greenhouse gas emissions. The latter two are informed by, amongst other matters, physical proximity to the railway station and existing public transport. Positive benefits are noted in respect of a number of SA objectives: - 7 - Leisure and recreation, 18 – Employment, 19 - town vitality and viability and 20 - inward investment on account of existing facilities, including employment sites west of Cranbrook, and policy CB2 requiring provision.</p>																					
<p>A significant adverse impact is identified against SA objective 17 as being a large site, in construction and operation (primarily people living in house), large levels of waste generation may be expected. In a number of cases negative impacts compared to SA objectives are identified for this the site; this includes in terms of avoiding adverse landscape impacts – SA objective 9. In landscape terms the site is quite flat with an absence of ridgelines where development could be of visual prominence though being a large site some adverse impacts could be expected. The site is relatively close to Exeter Airport and noise impacts are therefore a matter of possible concern, SA objective 6 - noise sees a negative SA impact, though noise concerns would be more relevant in the southern parts of the site rather than the northern. Mitigation measures, to some degree at least, would be possible to address adverse impacts and the site falls well beyond the airport 55 db line. There could also be possible noise concerns should any development be too close to London Road or the railway line. There are few historic assets, SA Objective 8, on or immediately around the site though negative impacts could be possible as would population and construction impacts on SA Objective 13 – air, soil and water.</p>																					
<p>Site A1 forms the bulk of the Cranbrook local plan Bluehayes expansion area as allocated under Policy CB2 of the plan. It should be noted that A2 is shown on the masterplan for potential SANGs land.</p>																					
<p><u>Commentary on suitability to accommodate gypsies and travellers</u> <u>The appraisal of Site A1 shows that it performs well in sustainability terms in respect of scope for accommodating a gypsy and traveller site. Because site A1 is substantial in scale there are a range of plot options on which a gypsy and traveller site could be located. However, there is existing housing to much of the east, west and north of the site, hence identifying a fringe location may be more challenging than on some larger promoted sites at Cranbrook and any fringe site may result in residents travelling through the Bluehayes expansion area before reaching London Road. Site A1 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 close to major employment sites. Being a site with a single developer controlling interest it performs well in respect of financial impact considerations. If a gypsy and traveller site were too far north in Site A1 any provision could be vulnerable to noise impacts from the railway or too far south from noise impacts from London Road, Being a large site, proposed for comprehensive development, there should be scope to ensure good highway access to any gypsy and traveller site. Note that Site A2 is commented on at the end of the tables.</u></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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Sites B1 and B2 combined	-	++	++	-	0	--	+	-?	--	0	0	++	-	++	0	0	--	+	+	+
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The combined B1 and B2 area forms the approximate extent of the south-western expansion area proposed by the New Community partners in planning 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). Area B1 forms a large part of the Treasbeare allocation under Policy CB3 of the plan.

B1 and B2, as a combined area, performs well in respect of some SA indicators and less well in respect of others. 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 substantial levels of housing, as part of a comprehensive development scheme. The site (especially part B1) is also close, albeit separated by London Road, from 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. Given proximity to facilities the site scores significant positive benefits against SA objectives 1 – Housing, 2 - Community services, 3 - Education and skills, 4 – Health, 12 - Sustainable Transport and 14 - Greenhouse gas emissions. The latter two are informed by, amongst other matters, existing public transport. Positive benefits are noted in respect of a number of SA objectives: - 7 - Leisure and recreation, 18 – Employment, 19 - town vitality and viability and 20 - inward investment on account of existing facilities, including employment sites west of Cranbrook, and policy CB2 requiring provision.

However, 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 (especially B2 as opposed to B1) 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 significant negative associated with this option is in respect of landscape impacts, SA objective 9. The B1 combined area crosses a ridgeline that is visible from Rockbeare village and development could have significant negative 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.

Site B1 form the bulk of the Cranbrook plan Treasbeare expansion area as allocated under Policy CB3 of the plan. Site B2, except for some small parts on the northern edge allocated for recreation space use and employment use, is not allocated in the plan for development, though is shown to offer SANGs potential.

Commentary on suitability to accommodate gypsies and travellers

Sites B1 and B2 combined cover a very large area and so the generic overview that SA work reveals is of lesser relevance for what would be a small area that a gypsy and traveller site may cover. Nonetheless the SA work does highlight significant potential negative impacts that could arise in respect of 6 – noise and 9 - landscape considerations. However see specific commentary in respect of separate appraisals of site B1 and B2 below.

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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Site B1 only	++	++	++	++	0	-?	+	-?	-	0	0	++	-	++	0	0	--	+	+	+
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Area B1 has been defined to exclude land to the south (area B2 - see above) a large part of which falls above the 55 db World Health Organisation noise threshold. By excluding some areas above 55 dB level the health impacts, SA Objective 6, are reduced to (just) a negative impact. This also results in objectives 1 - opportunities to live in a decent house now achieving a significant positive scoring.

Appraisal of B1 shows that it 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 substantial levels of housing as part of a comprehensive development scheme. Proximity to the first phase of development at Cranbrook will ensure good access to existing services and facilities and being on the western edges of Cranbrook it is closer to major employment centres than other sites with benefits including reduced journey lengths to work. Given proximity to facilities the site scores significant positive benefits against SA objectives 1 – Housing, 2 - Community services, 3 - Education and skills, 4 – Health, 12 - Sustainable Transport and 14 - Greenhouse gas emissions. The latter two are informed by, amongst other matters, physical proximity to the railway station and existing public transport. Positive benefits are noted in respect of a number of SA objectives: - 7 - Leisure and recreation, 18 – Employment, 19 - town vitality and viability and 20 - inward investment on account of existing facilities, including employment sites west of Cranbrook, and policy CB3 requiring provision.

A significant adverse impact is identified against SA objective 17 as being a large site, in construction and operation (primarily people living in house), large levels of waste generation may be expected. In a number of cases negative impacts compared to SA objectives are identified for this the site; this includes in terms of avoiding adverse landscape impacts – SA objective 9. In landscape terms the site avoids extending over ridgelines where development could be of visual prominence though being a large site some adverse impacts could be expected. The site is relatively close to Exeter Airport and noise impacts are therefore a matter of possible concern, SA objective 6 - noise sees a negative SA impact. Mitigation measures would be likely to be needed to address adverse impacts and some SA scores (notably for housing) are based on assumption that mitigation and sound insulation measures, if or where needed, would be incorporated. There are few historic assets, SA Objective 8, on or immediately around the site though negative impacts could be possible as would impacts on SA Objective 13 – air, soil and water.

Site B1 form the bulk of the Cranbrook plan Treasbeare expansion area as allocated under Policy CB3 of the plan.

Commentary on suitability to accommodate gypsies and travellers

The appraisal of Site B1 shows that it performs reasonably well in sustainability terms in respect of scope for accommodating a gypsy and traveller site. Because site B1 is substantial in scale there are a range of plot options on which a gypsy and traveller site could sit or occupy. Site B1 is to the south of the first phase of development at Cranbrook ensuring reasonable access to existing services and facilities, though accessing these existing facilities would entail crossing the busy London Road which would emphasise the importance of on-site facility provision. Being on the western edges of Cranbrook Site B1 is close to major employment sites and being a large site with a single controlling interest it performs well in respect of financial impact considerations. The site is however close to Exeter Airport and noise impacts are therefore a matter of potential concern especially in the western parts of the site, though provision to far north in site B1 may result in adverse impacts from London Road. There are relatively few residential properties within and abutting site B1 although development close to the eastern ridge may have adverse landscape impacts. Being a large site, proposed for comprehensive development, there should be scope to ensure good highway access to any gypsy and traveller site, especially from a site closer to London Road.

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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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 and 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 and B2 would explicitly apply to this site – most critically in respect of noise (SA Objective 6). In respect of potential accommodation for gypsies and travellers noise impacts would be severe and this is a fundamental reason to discount this site from allocation consideration.

Sites B3	++	++	++	++	0	0	+	-?	-	0	0	++	-	++	0	0	-	+	+	+
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Site B3 is proposed for development by the New Community partners in application 15/0046/MOUT. In early Cranbrook Plan work it was not proposed for development (hence its standalone identification as a site) but it is now identified as part of the larger Treasbeare allocation. The site generally scores well (sharing mostly the same SA outcomes as Site B1) when measured against the sustainability objectives.

In commenting on Site B3 it is assumed that its development would be undertaken as part of a scheme that extends over a larger scheme centred on site B1. When considered as part of a larger scheme the appraisal (as has been done in this work) shows that it performs well in sustainability terms. It offers scope to accommodate a wide range of services and facilities that can be supplied in an integrated manner alongside substantial levels of housing as part of a comprehensive development scheme. The site is close to the first phase of development at Cranbrook ensuring good access to existing services and facilities and being on the western side of Cranbrook it is closer to major employment centres than others sites with benefits including reduced journey lengths to work. Given proximity to facilities the site scores significant positive benefits against SA objectives 1 – Housing, 2 - Community services, 3 - Education and skills, 4 – Health, 12 - Sustainable Transport and 14 - Greenhouse gas emissions. The latter two are informed by, amongst other matters, physical proximity to existing public transport. Positive benefits are noted in respect of a number of SA objectives: - 7 - Leisure and recreation, 18 – Employment, 19 - town vitality and viability and 20 - inward investment on account of existing facilities, including employment sites west of Cranbrook, and policy CB3 requiring provision.

In a number of cases negative impacts compared to SA objectives are identified for this the site; this includes in terms of avoiding adverse landscape impacts – SA objective 9. In landscape terms the site is of some prominence, though more so eastern rather than western parts.

The westerly half of Site B3 is allocated under Policy CB3 of the Cranbrook plan for built development as part of the Treasbeare expansion area with the remainder for formal open space use.

Commentary on suitability to accommodate gypsies and travellers

Site B3 shares many similar characteristics as the larger adjoining Site B1 when it comes to potential suitability for accommodating gypsies and travellers and in practical terms and for the most part the commentary for B1 also applies to this site (this observation is based on the understanding that B3 is under the same control as B1). It should be noted, however, that B3 is further away from the airport than most of B1 (and does not abut London Road) so it is less likely to be adversely affected by possible noise pollution, which is a particular benefit in respect of siting gypsy and traveller accommodation. Site B3 is also a more fringe location in respect of potential overall Cranbrook development and this could play in its favour. Direct road access to the site could be from the adjoining lane, which although it is a country lane is quite wide and as such would reasonably take larger vehicles without the need to drive through newly established residential estates.

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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Site C	+	+	+	+	0	-	+	0	0	0	0	++	-	++	0	0	-	+	+	+
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This is a small site, around 0.6 hectares, submitted through past SHLAA processes (Ref W103). Measured against sustainability objectives it achieves not dissimilar ratings as the adjoining much larger Site A1 and A2. However, whereas the larger A1 and A2 site saw a number of significant positive benefits, for example for SA objective 1 - housing because this site is much smaller and would deliver much less scale of impact is reduced to (just) positive.

The positive benefits that are noted for Site C are in respect of SA Objectives: 1 – Housing, 2 - Community services, 3 - Education and skills, 4 – Health, 7 - Leisure and recreation and 18 – Employment. SA objectives 12 – sustainable transport and 14 – greenhouse gas emissions are recorded as achieving significant positives impacts.

However, this critique 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 is some way, around 750 metres, from existing Cranbrook facilities (including shops and the primary school) and the site, being small scale, would not be able to secure direct on site delivery of facilities. 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.

Site C is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

Commentary on suitability to accommodate gypsies and travellers
Site C sits alongside Site A1 and as such would benefit from the proposed facilities that A1 would accommodate, though this is on the assumption that appropriate pedestrian links would be provided from this site to wider facilities. Site C is a small site and if developed to full capacity could potentially accommodate around 12 gypsy and traveller pitches. However, being a small site it is unlikely that a land owner would wish to bring the site forward for gypsy and traveller use, they typically could, instead, hold out for bricks and mortar residential values if the land were allocated or to be in a Built up Area Boundary.

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 D	+	-	+	+	0	-	+	0	0	0	0	++	0	++	0	0	-	+	0	0	
<p>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, whereas the larger A1 and A2 site saw a number of significant positive benefits, for example for SA objective 1 – housing, because this site is much smaller and would deliver much less the scale of impact is reduced to (just) positive. - Positive benefits are noted in respect of a number of SA objectives: 1 – Housing, 3 - Education and skills, 4 – Health, 7 - Leisure and recreation and 18 – Employment.</p> <p>However, this critique 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. Furthermore the site lies around 950 metres from existing facilities at Cranbrook. There is a timing issue at play in that some of 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.</p> <p>Site D is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.</p> <p>Commentary on suitability to accommodate gypsies and travellers <u>Site D, at early 2020, accommodates a residential property and therefore is not assessed any further.</u></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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Site E	+	-	+	+	0	-	+	0	0	0	0	++	0	++	0	0	-	+	0	0
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Site E is a small site submitted through past SHLAA processes. Measured against sustainability objectives it achieves similar ratings as the much larger Site A1 and A2 that lies to its east and on the opposite side of Station Road. However, whereas the larger A1 and A2 site saw a number of significant positive benefits, for example for SA objective 1 – housing, because this site is much smaller and would deliver much less the scale of impact is reduced to (just) positive. Positive benefits are also noted in respect of a number of SA objectives: 1 – Housing, 3 - Education and skills, 4 – Health, 7 - Leisure and recreation and 18 – Employment.

However, this critique 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. Furthermore the site lies around 1,050 metres from existing facilities at Cranbrook so access for pedestrians is poor. There is a timing issue at play in that some of 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.

Site E is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

Commentary on suitability to accommodate gypsies and travellers

Site E falls to the west of Site A1 and on the western side of Station Road. The site could benefit from the proposed facilities that A1 would accommodate, though this would involve crossing Station Road. Site E benefits from being in a fringe location and road access potential, directly from Station Road, would appear to be reasonable although the short comings of Station Road itself are noted. The site benefits from being in a fringe location though there are a number of existing/nearby residential properties to the site. However, being a small site it is unlikely that a land owner would wish to bring the site forward for gypsy and traveller use, they typically could, instead, hold out for bricks and mortar residential values.

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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Site F	+	-	-	0	0	-	0	0	+	0	0	-	+	-	0	0	-	-	0	0
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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 some parts apparently underused) and some parts are empty vacant buildings and yards and car parks. The sites 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 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 expensive to provide. Allied to the poor accessibility are negatives 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 therefore scope for future job provision.

Site F is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

Commentary on suitability to accommodate gypsies and travellers

Site F lies to the north of the Exeter–Waterloo railway line with vehicular and pedestrian access to Cranbrook being via a dog-leg aligned narrow bridge over the railway line that does not have a footpath. The site performs poorly, therefore, in accessibility to facility terms and general safety concerns. The site is not part of a wider land interest holding and therefore it is unlikely to support social and community facilities in its own right. Furthermore being a small site it is unlikely that a land owner would wish to bring the site forward for gypsy and traveller use, they typically could, instead, hold out for bricks and mortar residential values. Any site development could also result in the loss of employment uses, though this may be tempered to some degree by potential for collocating gypsy and traveller homes with land for jobs.

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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Site G	++	++	++	++	0	-?	+	-?	-	0	0	++	-	++	0	0	--	+	+	+
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Appraisal of Site G shows that it 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 substantial levels of housing as part of a comprehensive development scheme. The site also sits close to parts of Cranbrook that are currently being developed and this should ensure good access to existing services. Given proximity to facilities and the scale of the site, it scores significant positive benefits against SA objectives 1 – Housing, 2 - Community services, 3 - Education and skills, 4 – Health, 12 - Sustainable Transport and 14 – greenhouse gas emissions. Positive benefits are noted in respect of a number of SA objectives including: 7 - Leisure and recreation, 18 – Employment, 19 - town vitality and viability and 20 - inward investment on account of existing facilities, including employment sites west of Cranbrook, and policy CB4 requiring provision. There are a number of negative impact scores recorded, including for 6 – noise with concerns over possible noise impacts from London Road and the railway. However it is presumed that any development would not be close to the railway line (in accordance with the masterplan) however if this were not the case then adverse impacts may be noted. QA negative, primarily on account of site size, for landscape impact – SA objective 9 is also noted. The western parts of the site are flatter and impacts might be expected to be lower but moving eastward across the site it becomes more hilly with more planting and existing landscape features and as such adverse impacts from development would be expected to rise.

A significant adverse impact is identified against SA objective 17 for waste as being a large site, in construction and operation (primarily people living in house), large levels of waste generation may be expected. There are few historic assets, SA Objective 8, on or immediately around the site though negative impacts could be possible as would population and construction impacts on SA Objective 13 – air, soil and water.

Most of Site G, specifically westerly parts, is allocated under Policy CB4 of the plan for built development as part of the Cobdens expansion area with the bulk of the none allocated site identified as offering potential for SANGs.

Commentary on suitability to accommodate gypsies and travellers

The appraisal of Site G shows that it performs well in sustainability terms in respect of scope for accommodating a gypsy and traveller site. Because site G is substantial in scale there are a range of plot options on which a gypsy and traveller site could sit or occupy. There is some existing residential development in a central part of the site where there would be proximity to existing dwellings, and this would also apply to the westerly part of the site which abuts land with existing planning permission for development. Existing properties are located in the fringes of the site ensuring there are still many potential plot options available. Site G, which forms the bulk of the Cobdens allocation, will have its own services and facilities and so a gypsy and traveller site on this area of land will have good access to facilities and services. Being a site with a single developer controlling interest it performs well in respect of financial impact considerations. However, sections of the interior of the site are vulnerable to flooding and so would be unsuitable for gypsy and traveller development. The site is bounded by London Road and the railway so there is some possible vulnerability to noise pollution if any provision were made close to these transport corridors. Integrating a gypsy and traveller site on the northern, southern and south eastern fringes of the site is likely to be easier than other locations due to the potential for good road access and limited landscape impact as well as addressing the gypsy and travelling community's preference for a site on the periphery of the settlement so as not to feel hemmed in or overlooked by bricks and mortar housing (as expressing at preferred approach consultation).

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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Site H1	+	+	+	+	0	- ?	+	0	0	0	0	+	0	+	0	0	-	0	0	0
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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) and it is understood that the consortium have control of Site H1. Site H1 is not allocated in the East Devon local Plan but it is shown for development in the masterplan. The site generally performs well when assessed against the sustainability considerations with similar scores and considerations as applied to Site G appraisal (albeit it being smaller in scale some of the significant positives for site G are reduced to just positives for this site H1. Developed would be expected alongside and as part of comprehensive scheme with adjoining site G. It is highlighted that SA objective 6 – noise scores an uncertain negative. The site lies alongside the railway line and development, especially any development close to the line, could be adversely impacted by noise (at its worst it could potential amount to a significant negative impact).

The bulk of Site H1 is allocated for development in the Cranbrook Plan for built development. Only the most northerly part of the site, adjacent to the railway line, is not allocated and this is identified for recreation uses.

Commentary on suitability to accommodate gypsies and travellers
Site H1 falls under the same developer control as Site G and therefore being a site with a single developer controlling interest it performs well in respect of financial impact considerations. It also benefits from relative physical proximity to the services and facilities that the Cobdens development is planned to accommodate. Whilst the site is in a fringe location of the town it is remote from existing main roads and access to the highway network and lies adjacent to the railway line. Any future access to the site could involve use of residential roads. It may be some years before the road is in place and therefore site provision could be made and new homes for gypsies and travellers provided; early delivery of these pitches is important. The site is on rising land, enclosed by existing field boundary hedgerows which provide some screening and with pitches being relatively low, impact in the landscape may not be too adverse

Site H2	+	+	+	+	0	--	+	0	-	0	0	+	0	+	0	0	-	0	0	0
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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. The site generally performs well assessed against a number of sustainability considerations as applied to site G and H1, albeit the site is further from existing and planned facilities than site H1. Positive effects are recorded for SA Objectives - 1 Housing, 2 Community services, 3 Education and skills, 4 Health, 7 Leisure and recreation, 12 sustainable transport and 14 greenhouse gas emissions. The notable negatives are in respect of 9 - landscape character and 6 - noise. 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. Proximity to the railway may also be expected to generate noise impact concerns, perhaps to the point where they could be considered to be of a significant negative scale.

Site H2 is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary. It is however identified as offering potential to accommodate SANGs.

Commentary on suitability to accommodate gypsies and travellers
Site H2 shares many similarities with the adjoining Site H1 and therefore many similar considerations apply to this land area. However it is physically more closely related to the railway line and therefore has the potential for increased adverse noise impacts. The northerly sloping nature of this site also makes it more vulnerable to having adverse landscape impacts.

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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Site I	+	+	+	+	0	+	+	0	-	0	0	+	0	+	0	0	-	0	0	0
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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 with the expectation of a number of positive benefits, albeit the site will be some way from core central facilities of Cranbrook, for example around 2,300 metres from the town centre.

The site, being small scale, would not be able to secure direct on site delivery of facilities and whilst this factor 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. There is a timing issue at play in that the positive wider sustainability benefits identified would only hold true if facilities, as part of the Cobdens development, 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 of its location on the easterly edge of Cranbrook and the fact that on the eastern fringes of Cranbrook landscape sensitivity increases significantly and the site is elevated above land to the west.

Site I is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

Commentary on suitability to accommodate gypsies and travellers

Site I is a small site and it is unlikely that a land owner would wish to bring the site forward for gypsy and traveller use, they are more likely, instead, to hold out for bricks and mortar residential values. The site, through SA work (above), did not score especially well for regular bricks and mortar housing and the same considerations would apply for gypsy and traveller use. Further to this the site is presently served by a narrow country lane and this road may present fundamental access problems and challenges in respect of regular large vehicle movements. Though in the sites favour it is in a fringe location of Cranbrook.

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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Site J	+	+	+	+	0	+	+	- ?	-	0	0	+	0	+	0	0	-	0	0	0
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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 with the expectation of a number of positive benefits, albeit the site will be some way from core central facilities of Cranbrook, for example around 2,500 metres from the town centre.

The site, being small scale, would not be able to secure direct on site delivery of facilities and whilst this factor 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. There is a timing issue at play in that the positive wider sustainability benefits identified would only hold true if facilities, as part of the Cobdens development, 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 of its location on the easterly edge of Cranbrook and the fact that on the eastern fringes of Cranbrook landscape sensitivity increases significantly.

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 that promoting the site the existing buildings are indicated as retained but even with retention there could be potential for adverse heritage impacts.

Site J is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

Commentary on suitability to accommodate gypsies and travellers

Site J is a small site and it is unlikely that a land owner would wish to bring the site forward for gypsy and traveller use, they are more likely to, instead, hold out for bricks and mortar residential values. The site through SA work (above) did not score especially well for regular bricks and mortar housing and the same considerations would apply for gypsy and traveller use. The site includes a Grade II listed property and adverse impacts on its setting could occur. The site is in a fringe location which is to its favour.

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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Site K	+	+	+	+	0	+	+	- ?	-	0	0	+	0	+	0	0	-	0	0	0
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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) and is understood to be in their control. Site K is allocated in the East Devon local Plan. 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, though it is a flat area of land. A further concern in respect of this site is that it is comparatively remote from areas proposed for development, for example 2,400 metres from the town centre. A possible negative historic environment impact, SA objective 8, is noted given the listed building to the north of the site at Little Cobden Cobden.

In Cranbrook Plan policy terms site K falls into three roughly equal parts. The most westerly part is allocated for built development, the central strip is allocated for a gypsy and traveller site and the easterly part is shown for formal open space use falls outside of the Built-up Area Boundary.

The most westerly part of the site is the least sensitive in landscape terms and the central area would accommodate gypsy caravans, under plan policy, that are not as high as houses and so less likely to impact on skyline views.

Commentary on suitability to accommodate gypsies and travellers
The part of Site K that is allocated for a gypsy and traveller site in the Cranbrook Plan comprises of the easterly field (west of the retained power line). It is understood to be under the same developer control as site G and it forms part of the Cobdens allocation. The site will be sufficiently proximate to the facilities and services that are to be accommodated in the wider Cobdens expansion area and also close to facilities to be provided at the Grange allocation, albeit access would necessitate crossing London Road. The site also benefits, for gypsy and traveller accommodation, in not having any immediate neighbouring residential properties and it does sit at what will be a fringe but not isolated part of Cranbrook. There should be scope for direct road access to the site from London Road and some screening to the road frontage and east and west boundaries. Further screen planting would also be appropriate on the northern boundary so as to minimise any impact upon the setting of Little Cobden, the listed building to the north. Alternative road access may be achieved from Cobdens Lane. The site is at the eastern gateway to the proposed expanded town and therefore site layout, design and landscaping would need to be mindful of this consideration, however being relatively level and with existing boundary hedgerows this is considered entirely possible. A powerline crosses the site but as it is quite a substantial area there would be scope to locate the residential units in a suitable area in order to avoid development under this line.

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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Site L1	+	+	+	+	0	+	+	0	0	0	0	+	0	+	0	0	-	0	0	0
<p>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.</p> <p>Generally L1 site performs well when compared against the sustainability objectives. Positives effects are recorded for SA Objectives - 1 Housing, 2 Community services, 3 Education and skills, 4 Health, 7 Leisure and recreation, 12 sustainable transport and 14 greenhouse gas emissions. 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 only 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 facility development and delivery.</p> <p>Site L1 form a part of the Cranbrook local plan Grange expansion area as allocated under Policy CB5 of the plan.</p> <p><u>Commentary on suitability to accommodate gypsies and travellers</u> <u>Having a boundary with London Road this site has the potential to accommodate a gypsy and traveller site with easy access to the road, which is important for gypsies and travellers. The site is identified for development in the Plan and incorporates part of a neighbourhood centre which once provided would deliver good access to facilities and services as detailed in the assessment above. The site is not, however (specifically the parts adjoining or close to London Road) in a fringe location of Cranbrook and accessing southern parts of the site would be likely to require vehicles going through areas of new residential development, this plays against its suitability for gypsy and traveller use. Site L1 also forms part of a total option agreement that by area is smaller than other big strategic allocation ownerships/options and this could impact on whether the land owner might wish to bring the site forward for a combined residential and mixed use development as well as gypsy and traveller use, rather they potentially 'sit on the site' and not bring it forward for development at all.</u></p>																				

Site L2	+	+	+	+	0	+	+	0	-	0	0	+	0	+	0	0	-	0	0	0
<p>This site is around 6.8 hectares in extent 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. The site performs well when compared against a number of sustainability objectives. Though as with L1 this would only hold true under assumption of securing community facilities. Furthermore it is longer distance from existing and planned facilities at Cranbrook than site L1.</p> <p>A specific negative is identified for this site in respect of landscape impacts, SA Objective 9, on account of potential for development being of prominence from views from the south.</p> <p>Site L2 is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary. It is, however, shown as offering scope for accommodating SANGs.</p> <p><u>Commentary on suitability to accommodate gypsies and travellers</u> <u>Site L2, is not proposed for built development though the assessment above, which applies to Site L1, also applies to Site L2 in respect of potential for gypsy and traveller use. Furthermore Site L2 is further remote from London Road which would make direct access, specifically avoiding new residential roads, more problematic for this site than for site L1.</u></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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Site M	+	+	+	+	0	+	+	0	-	0	0	+	0	+	0	0	-	0	0	0
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Site M is around 8.2 hectares in extent and is being promoted for development by agents acting for the landowner. At preferred approach stage of plan making it was not shown for development in the masterplan and it is noted that as a standalone site it would be remote from a number of services in facilities, separated from the rest of Cranbrook by site Y which was not previously allocated for development but now is allocated. With Site Y now featuring as an allocation it is appropriate to revisit the assessment work for Site M.

Site M generally performs well when compared against the sustainability objectives. Positives effects are recorded for SA Objectives - 1 Housing, 2 Community services, 3 Education and skills, 4 Health, 7 Leisure and recreation, 12 sustainable transport and 14 greenhouse gas emissions. However this observation holds true, to some degree, under an assumption that social and community facilities can be secured alongside site development. The site is, for example, around 2,400 metres from the town centre of Cranbrook and access to the town centre would involve crossing London Road. If developed on a standalone basis, the site could be expected to support only a 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 facility development and delivery.

A specific negative identified for this site is in respect of landscape impacts, SA objective 9, on account of its location on 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 southerly parts of the site lies beyond and separated from the proposed areas of development of Cranbrook by a large block of woodland (the southern part of the site, taken alone, could justify a significant negative impact).

Most of the north of Site M is allocated for built development in the Cranbrook Plan as part of the Grange expansion area under Policy CB5.

Commentary on suitability to accommodate gypsies and travellers

Site M has a boundary with London Road and on this account the site has the potential to accommodate good vehicle access potential which is to its advantage. The site is identified for built development in the Plan and it is close to a neighbourhood centre which once provided would deliver good access to facilities and services. The site is also in a fringe location of Cranbrook which is a positive in respect of potential suitability. Site M, however, forms part of a total option agreement that by area much smaller than other big strategic allocation ownerships and this could impact on whether the land owner might wish to bring the site forward for development at all, to incorporate a gypsy and traveller use, or whether they would be more inclined not bring it forward for development at all.

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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Site N	+	+	+	+	0	+	+	0	-	0	0	+	0	+	0	0	-	0	0	0
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Site N extends to around 9.1 hectares. Generally the site performs well when compared against the sustainability objectives. Positive impacts are identified in respect of SA objectives 1 – housing, 2 – community services, 3 – education and skills, 4 – health, 6 – noise (though this may not hold true for any houses immediately next to or near to London Road), 12 – sustainable transport and 14 – greenhouse emissions.

However 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 a 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.

The vast majority of the north of Site N is allocated for built development in the Cranbrook Plan as part of the Grange expansion area under Policy CB5, with the southerly edge shown as appropriate for SANGs provision.

Commentary on suitability to accommodate gypsies and travellers

Site N has a boundary with London Road and on this account the site has the potential to accommodate good vehicle access potential which is to its advantage. The site is identified for built development in the Plan and it is close to a neighbourhood centre which once provided would deliver good access to facilities and services. The site also has some Cranbrook fringe edges to it which is a positive in respect of potential suitability, Site N, is though, in a landowning ownership that is much smaller than other big strategic allocation ownerships and this could impact on whether the land owner might wish to bring the site forward for development at all, to incorporate a gypsy and traveller use, or whether they would be more inclined not bring it forward for any development.

Site N – Extended Area	+	+	+	+	0	+	+	0	--	0	0	+	0	+	0	0	-	0	0	0
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At the Preferred Approach stage of plan making this site was not assessed in the SA but as it has been promoted for development assessment is seen as appropriate at this publication stage of work.

The site is very similar in terms of SA objectives scores as Site N, though in terms of accessibility to facilities is somewhat less attractive. However, it is in respect of landscape impacts, SA Objective 9, where a significant negative impact is identified. Parts of site are prominent in views from the south and the site extends over a ridgeline that separates it from the rest of the proposed development of Cranbrook.

Site N - Extended Area is not allocated for built development but is shown as offering potential for SANGs.

Commentary on suitability to accommodate gypsies and travellers

Site N – Extended Area - is not proposed for built development and the assessment above, which applies to Site N, also applies in this respect to potential for gypsy and traveller use. Furthermore this site is more remote from London Road which would make direct access, specifically avoiding new residential roads, more problematic than for Site N.

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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Site O	+	+	+	+	0	+	+	0	0	0	0	+	0	+	0	0	-	0	0	0
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Site O extends to around 7.1 hectares. 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. Positive impacts are identified in respect of SA objectives 1 – housing, 2 – community services, 3 – education and skills, 4 – health, 6 – noise (though this may not hold true for any houses immediately next to or near to London Road), 12 – sustainable transport and 14 – greenhouse emissions. 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 and promoted for development at 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 appraisal.

Whilst the site scores a negligible impact against SA objective 9 – Landscape Quality it is relevant to note that it falls within land shown as a Green Wedge in the East Devon Local Plan and this designation is afforded specific protection in the Made Rockbears Neighbourhood Plan.

Site O is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

Commentary on suitability to accommodate gypsies and travellers

Site O is not allocated for development in the plan and the above assessment has general relevance for potential for gypsy and traveller use. To the sites advantage, however, is that it does have a boundary to London Road and on this account the site has the potential to provide good vehicle access. The site also has some Cranbrook fringe edges to it which is a positive, though these are away from London Road and accessing them would be likely to entail use of residential roads. Some fringe parts also have proposed residential development to boundaries. Site O is in a landowning ownership that is smaller than the big strategic allocation ownerships and this could impact on whether the land owner might wish to bring the site forward for development at all, to incorporate a gypsy and traveller use or whether they would be more inclined not bring it forward for any development – particularly noting that it is not allocated for any other supporting 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
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Site P	+	+	+	+	0	+	+	0	-	0	0	+	0	+	0	0	-	0	0	0
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Site P extends to around 2 hectares in size. Across a number of the sustainability objectives the site performs well. Positive impacts are identified in respect of SA objectives 1 – housing, 2 – community services, 3 – education and skills, 4 – health, 6 – noise (though this may not hold true for any houses immediately next to or near to London Road), 12 – sustainable transport and 14 – greenhouse emissions. An exception, however, is in respect of landscape considerations, SA Objective 9. 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 the Local Plan Green Wedge and this designation is afforded specific protection in the Made Rockbeare Neighbourhood Plan.

Site P is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

Commentary on suitability to accommodate gypsies and travellers

Site P is not allocated for development in the plan and the above assessment has general relevance for potential for gypsy and traveller uses. To the sites advantage, however, is that it does have a boundary to London Road and on this account the site has the potential to provide good vehicle access. The site also has some Cranbrook fringe edges to it which is an advantage. Site P is in a landowning ownership that is smaller than the big strategic allocation ownerships and this could impact on whether the land owner might wish to bring the site forward for development at all, to incorporate a gypsy and traveller use or whether they would be more inclined not bring it forward for any 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
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Site Q	+	+	+	+	0	-	+	0	--	0	0	+	0	+	0	0	-	0	0	0
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Site Q extends to around 2.3 hectares in size. Across a number of the sustainability objectives the site performs well with proximity to the town centre of Cranbrook being in the particular favour of the town. Informed by proximity considerations the site performs well in respect of objectives - housing, 2 – community services, 3 – education and skills, 4 – health, 7 – leisure and recreation, 12 – sustainable transport and 14 – greenhouse gas emissions. Though these positives would only hold true under assumption that social and community facilities can be secured alongside site development. At a site size of only 2.3 hectares, if developed on a standalone basis, the site could be expected to support a 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.

The notable exception with respect of potential impacts is in respect of landscape considerations, SA objective 9, where a significant negative effect is identified. 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 and this designation is afforded specific protection in the Made Rockbeare Neighbourhood Plan. Whilst some parts of the site would be less visually prominent than others and adjacent to London Road parts may be seen to be of limited landscape impact importance, at the land near or next to London Road, however, noise considerations may result in adverse impacts hence the negative recorded against SA Objective 6 for noise.

Site Q is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

Commentary on suitability to accommodate gypsies and travellers

Site Q is not allocated for development in the plan and the above assessment has general relevance for potential for gypsy and traveller uses. To the sites advantage, however, is that it does have a boundary to London Road and on this account the site has the potential to provide good vehicle access. However, it is also very close to core central parts of the town and as such lack's a fringe area character. Site Q is in a landowning ownership that is smaller than the big strategic allocation ownerships and this could impact on whether the land owner might wish to bring the site forward for development at all, to incorporate a gypsy and traveller use or whether they would be more inclined not bring it forward for any 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
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Site R	+	+	+	+	0	0	+	0	--	0	0	+	0	+	--	0	-	0	0	0
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This site was not previously proposed for development by landowners though is understood to be in the same ownership/control as the promoter of Site O, P and Q. Site R is indicatively show in the issues and options submissions by the site controllers as open space (as is land to the south of O, P and Q). Appraisal is undertaken at this stage of plan making work for reasons of completeness of assessment.

Across a number of the sustainability objectives the site performs well with proximity to the town centre of Cranbrook being in the particular favour of the site, albeit access to the town centre would involve crossing the busy London Road.. Informed by proximity considerations the site performs well in respect of objectives - housing, 2 – community services, 3 – education and skills, 4 – health, 7 – leisure and recreation, 12 – sustainable transport and 14 greenhouse gas emissions. Though these positives would only hold true, to some degree, under assumption that social and community facilities can be secured alongside site development

The notable exception with respect of potential impacts is in respect of landscape considerations, SA objective 9, where a significant negative effect is identified. The significant negative landscape consideration relate to both visual impact concerns and also the fact that the village of Rockbeare is to the east of the site and the village currently has a particular character in the landscape that is defined by surrounding open/undeveloped countryside. Development of this site, which is very open, would erode to a great extent that open character, noting as well that the site lies within a local plan Green Wedge and this designation is afforded specific protection in the Made Rockbeare Neighbourhood Plan.. It should also be noted that a large part of the site falls in a floodplain (though some is outside) hence the significant negative recorded against SA objective 15 for flood risk.

Site R is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

Commentary on suitability to accommodate gypsies and travellers

Site R is not allocated for development in the plan and the above assessment has general relevance for potential for gypsy and traveller uses. The site does not have a boundary to London Road and instead access would have to use Parsons Lane. This road is of limited width along its central and eastern sections but does currently support typical farm traffic through the use of passing places. The site is close to core central parts of the town and the facilities they offer but pedestrian access to those are not currently high quality.

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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Site S	+	+	+	+	0	- ?	+	0	--	0	0	+	0	+	0	0	-	0	0	0
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Site S was not formally appraised at Preferred Options stage of plan making but is assessed now at Publication stage for completeness reasons. It is a small site in close proximity of many of the existing facilities of Cranbrook and close to the town centre, albeit it lies south of London Road. Proximity to planned and existing facilities plays to the favour of the site and helps account for positive scores against a number of the SA objectives, specifically 1- housing, 2, community services, 3 – education and skills, 4 – health, 7 – leisure and recreation, 12 sustainable transport and 14 – greenhouse gas emissions (with the last two informed by proximity and ease of access to public transport). However as the site fronts on to London Road there is some potential, with uncertainty noted, for negative noise impacts, SA objective 6, and more importantly a significant negative impact on SA objective 9 - landscape quality. This site falls in a Local Plan Green Wedge and is an open and visually exposed area of land and this designation is afforded specific protection in the Made Rockbeare Neighbourhood Plan.

Site S is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

Commentary on suitability to accommodate gypsies and travellers

Site S is not allocated for development but it does, however, have direct access to London Road and on this count the site has the potential to provide good vehicle access. It is very close to core central parts of the town and whilst having fringe area characteristics it is a site of prominence and visual openness in the landscape. Site S is small and it's assumed that it is unlikely, should it be allocated for general housing development, that a land owner would want to readily bring it forward for mixed use development to incorporate a gypsy and traveller use.

Site T – Excluding S West Corner	+	+	+	+	0	- ?	--	0	--	0	0	+	0	+	0	0	-	0	0	0
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Site T, excluding the south west corner, was shown on the sites appraised map with commentary at preferred approach stage of plan making but was not formally appraised. It is, however appraised now for completeness reasons. It is a small site in close proximity of many of the existing facilities of Cranbrook and close to the town centre, albeit it lies south of London Road. Proximity to planned and existing facilities plays to the favour of the site and helps account for positive scores against a number of the SA objectives, specifically 1- housing, 2, community services, 3 – education and skills, 4 – health, 12 sustainable transport and 14 – greenhouse gas emissions (with the last two informed by proximity and ease of access to public transport).

However as the site fronts on to London Road there is some potential, with uncertainty noted, for negative noise impacts, SA objective 6, and more significantly a significant negative impact on SA objective 9 - landscape quality and 7 – leisure and recreation. This site falls in a Local Plan Green Wedge and is an open and visually exposed area of land and a large part of it is identified for use as part of the country park and development would have significant adverse impacts on leisure and recreation use and potential.

Site T, excluding the south west corner, is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

Commentary on suitability to accommodate gypsies and travellers

Site T is not allocated for development but it does, however, have direct access to London Road and on this count the site has the potential to provide good vehicle access. However a large part of the site forms part of the Cranbrook Country Park and it is discounted from further assessment on account of this status and its general lack of suitability for development as noted above.

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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Site T – South west corner only	+	+	+	+	0	0	0	0	- ?	0	0	+	0	+	0	0	-	0	0	0
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The south west corner of site T is appraised separately from the remainder of Site T as part of this area is proposed for a gypsy and traveller site. It is a small site in close proximity to many of the existing facilities of Cranbrook and close to the town centre, albeit it lies south of London Road. Proximity to planned and existing facilities plays to the favour of the site and helps account for positive scores against a number of the SA objectives, specifically 1- housing, 2, community services, 3 – education and skills, 4 – health, 7 – leisure and recreation, 12 sustainable transport and 14 – greenhouse gas emissions (with the last two informed by proximity and ease of access to public transport).

There is possible potential however for negative effects, albeit with uncertainty noted, on landscape character – SA objective 9. The site falls in a local plan Green Wedge area and taller buildings on the site may be of some visual prominence. Though caravans, being significantly less high than two or three storey houses, would be much less prominent than ‘bricks and mortar’ housing. Planting and landscaping of the site could also provide mitigation from adverse impacts.

The south west corner of site T is allocated on the Cranbrook Plan Policies Map for a gypsy and traveller site.

Commentary on suitability to accommodate gypsies and travellers

Site T – south west corner only - shares many similar characteristics as the larger close by Site B1 and it is understood to be under the same ownership and control. The site would be close to the facilities that are to be accommodated at the Treasbears expansion area and also close to existing facilities built in the first phase of Cranbrook development and the town centre, albeit access would necessitate crossing London Road. Accessibility to facilities, for this site, is therefore a positive consideration. The site also benefits, for gypsy and traveller accommodation, in not having any immediate neighbouring residential properties and it does sit within what will be a fringe but not isolated part of Cranbrook. There is direct road access to the site from the adjoining lane and subject to design, this may negate the need to drive through newly established residential areas; alternatively access may be derived from the proposed residential parcel to the west and this would be a short section of road before exiting onto London Road. The site is on sloping land with clear views afforded from London Road, properties overlooking London Road in the vicinity and the western end of the existing Cranbrook Country Park. The existing boundary hedges to Parsons Lane provide some screening though further planting would be needed to offset other potential adverse impacts. Topography is such that the site is screened from Rockbears and will not lead to settlement coalescence. With careful landscaping any landscape and visual impacts could be mitigated.

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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Site U	+	0	+	+	0	-	+	0	0	0	0	++	0	++	0	0	-	+	0	0
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Site U is a small area of land adjoining London Station Road. Measured against sustainability objectives it achieves similar ratings as the much larger Site A1 and A2 that lies to its east. However, whereas the larger A1 and A2 site saw a number of significant positive benefits, for example for SA objective 1 – housing, because this site is much smaller and would deliver much less the scale of impact is reduced to (just) positives. Positive benefits are noted in respect of a number of SA objectives: 1 – Housing, 3 - Education and skills, 4 – Health, 7 - Leisure and recreation and 18 – Employment. Because of access to public transport significant positives are identified against SA objectives 12 and 14 for sustainable transport and greenhouse gas emissions.

However, this overall critique 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. To its favour is the fact that the site is on the western side of London Road, and access to Cranbrook facilities would not entail crossing this road. But even without the need to cross the road the site is far from ideal in respect of pedestrian access to services, it lies around 850 metres from existing facilities at Cranbrook. There is a timing issue at play in that some of 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.

Site U is allocated for built development in the Cranbrook Plan and is shown as part of the Bluehayes Expansion Area.

Commentary on suitability to accommodate gypsies and travellers

At preferred approach stage this site was identified as being a location for gypsy and traveller pitches, however such an allocation does not form part of the Plan submitted for examination. It is in separate landowner control to the majority of the rest of the Bluehayes allocation, which is controlled by developers. The site lies on a bend of Station Road, linking London Road to the south with Dog Village and Broadclyst to the north and has the potential for access to be derived directly from Station Road. However, the road is narrow in places and additional use by large vehicles would not be preferential. The site is bound by hedgerows and in landscape terms, use in part as a gypsy and traveller site would have a neutral impact. Concerns were expressed at preferred approach consultation by the gypsy and traveller community over the perception that this site would be hemmed in and overlooked by residents. Furthermore the limited size of the site could result in the land owner seeking to hold out for bricks and mortar residential values and therefore not releasing the site for such an allocation.

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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Site V	+	+	+	+	0	+	+	0	0	0	0	+	0	+	0	0	-	0	0	0
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Site V is a small area of land adjoining ~~London Road~~ Station Road. Appraisal of this land area shows that it generally performs well in sustainability terms. If planned and developed alongside site A1 and A2 it would ensure that the site 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 is relatively close to the first phase of development at Cranbrook with reasonable 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; in this respect it scores significant positive benefits against SA objectives 12 - Sustainable Transport and 14 - Greenhouse gas emissions. Positive benefits are noted in respect of a number of SA objectives: 1 – Housing, 2 - Community services, 3 - Education and skills, 4 – Health, 7 - Leisure and recreation and 18 – Employment on account on policy provision in the plan requiring delivery. Because of access to public transport significant positives are identified against SA objectives 12 and 14 for sustainable transport and greenhouse gas emissions. It should also be noted that there are some community facilities in close by buildings to this site at and around Broadclyst Station (a former station on the railway line and buildings that developed around it).

In a number of cases negligible impacts compared to SA objectives are identified, however the site is close to both London Road and more importantly the Exeter to Waterloo railway and noise impacts are therefore a matter of possible concern, hence the negative impact scored against SA Objective 6 for noise.

Site V is allocated for built development in the Cranbrook Plan as part of the Bluehayes expansion area under Policy CB2.

Commentary on suitability to accommodate gypsies and travellers
Site V has a boundary with Station Road and on this account the site has the potential to accommodate vehicle access potential which is to its advantage. However, the road is narrow in places and additional use by large vehicles would not be preferential. The site is identified for built development in the Plan and it is close to some existing facilities at Broadclyst Station and it will be close to Bluehayes facilities. Although the site is in a fringe location of Cranbrook, the surrounding existing built development is to its disadvantage.

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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Site W	+	-	+	+	0	-	+	0	0	0	0	++	0	++	0	0	-	+	0	0
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This is a small site measured against sustainability objectives achieves similar ratings as the much larger Site A that lies to its east and on the opposite side of Station Road. However, whereas the larger A1 and A2 site saw a number of significant positive benefits, for example for SA objective 1 – housing, because this site is much smaller and would deliver much less the scale of impact is reduced to (just) positive. - Positive benefits are noted in respect of a number of SA objectives: 1 – Housing, 3 - Education and skills, 4 – Health, 7 - Leisure and recreation and 18 – Employment.

However, this critique 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. Furthermore the site lies around 950 metres from existing facilities at Cranbrook. There is a timing issue at play in that some of 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.

Site W is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

Commentary on suitability to accommodate gypsies and travellers

Site W falls on the western side of Station Road. The site could benefit from the proposed facilities that A1 would accommodate, though this would involve crossing Station Road. Site W benefits from being in a fringe location and road access potential, directly from Station Road, would appear to be good. However, the road is narrow in places and additional use by large vehicles would not be preferential. The site benefits from being in a fringe location which is to its advantage. However, being a small site it is unlikely that a land owner would wish to bring the site forward for gypsy and traveller use, they typically could, instead, hold out for bricks and mortar residential values.

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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Site X	+	+	+	+	0	-	+	0	--	0	0	+	0	+	0	0	-	0	0	0
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Across a number of the sustainability objectives site X performs well with proximity to the town centre of Cranbrook being in the particular favour of the site. Informed by proximity considerations the site performs well in respect of objectives - housing, 2 – community services, 3 – education and skills, 4 – health, 7 – leisure and recreation, 12 – sustainable transport and 14 – greenhouse gas emissions. Though these positives would only hold true under assumption that social and community facilities can be secured alongside site development. 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.

The notable exception with respect of potential impacts is in respect of landscape considerations where a significant negative effect is identified against SA objective 9. 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. Whilst some small northerly parts of the site would be less visually prominent the bulk of the site would be visually prominent.

Site X is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

Commentary on suitability to accommodate gypsies and travellers

Site X is not allocated for development in the plan and the above assessment has general relevance for potential for gypsy and traveller use. The site does have a small boundary to London Road and on this account the site has the potential to provide vehicle access. The site also has some Cranbrook fringe edges to it which is a positive. Site X is in a landowning ownership that is smaller than the big strategic allocation ownerships and this could impact on whether the land owner might wish to bring the site forward for development at all, to incorporate a gypsy and traveller use, or whether they would be more inclined not bring it forward for any 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
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Site Y	+	+	+	+	0	+	+	0	0	0	0	+	0	+	0	0	-	0	0	0
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Generally site Y performs well when compared against the sustainability objectives. Positives effects are recorded for SA Objectives - 1 Housing, 2 Community services, 3 Education and skills, 4 Health, 7 Leisure and recreation, 12 sustainable transport and 14 greenhouse gas emissions. However this observation holds true, to some degree, under an assumption that social and community facilities can be secured alongside site development. As a relatively small site, if developed on a standalone basis, the site could be expected to only 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 facility development and delivery.

Site Y form a part of the Cranbrook local plan Grange expansion area as allocated under Policy CB5 of the plan.

Commentary on suitability to accommodate gypsies and travellers
Site Y has a boundary with London Road and on this account the site has the potential to accommodate good vehicle access potential which is to its advantage. The site is identified for built development in the Plan and it is close to a neighbourhood centre which once provided would deliver good access to facilities and services. The site, other than its southern edge, is not however in a fringe location of Cranbrook which is a negative in respect of potential suitability for gypsy and traveller accommodation. Site Y, is in a landowning ownership that is much smaller than other big strategic allocation ownerships. This could impact on whether the land is released for a mixed use development at this time or held for future all residential (bricks and mortar) development. As this parcel forms a central connecting block within the Grange expansion area this would be a significant disadvantage.

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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Site Z1	+	0	+	+	0	-	+	0	0	0	0	++	0	++	0	0	-	+	0	0
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Site Z1 is a small area of land adjoining London Road. Measured against sustainability objectives it achieves similar ratings as the much larger Site A1 and A2 that lies to its east north. However, whereas the larger A1 and A2 site saw a number of significant positive benefits, for example for SA objective 1 – housing, because this site is much smaller and would deliver much less the scale of impact is reduced to (just) positives. Positive benefits are noted in respect of a number of SA objectives: 1 – Housing, 3 - Education and skills, 4 – Health, 7 - Leisure and recreation and 18 – Employment. Because of access to public transport significant positives are identified against SA objectives 12 and 14 for sustainable transport and greenhouse gas emissions.

However, this overall critique 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. To its favour is the fact that the site is on the western side of London Road, and access to Cranbrook facilities would not entail crossing this road. But even without the need to cross the road the site is far from ideal in respect of pedestrian access to services, it lies around 850 metres from existing facilities at Cranbrook. There is a timing issue at play in that some of 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.

Site Z1 is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

Commentary on suitability to accommodate gypsies and travellers

Site Z1 sits alongside Site A1 and as such would benefit from the proposed facilities that A1 would accommodate, though this is on the assumption that appropriate pedestrian links would be provided from this site to wider facilities. Site Z1 is a small site and it is unlikely that a land owner would wish to bring the site forward for gypsy and traveller use, they typically could, instead, hold out for bricks and mortar residential values if the land were allocated or to be in a Built up Area Boundary. The site lies close to a bend on Station Road, linking London Road to the south with Dog Village and Broadclyst to the north and has the potential for access to be derived directly onto Station Road. However, the road is narrow in places and additional use by large vehicles would not be preferential.

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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Site Z2	+	-	+	+	0	-	+	0	0	0	0	++	0	++	0	0	-	+	0	0
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Site Z2 is a small site which measured against sustainability objectives achieves similar ratings as the much larger Site A that lies to its east north and on the opposite side of Station Road. However, whereas the larger A1 and A2 site saw a number of significant positive benefits, for example for SA objective 1 – housing, because this site is much smaller and would deliver much less the scale of impact is reduced to (just) positive. Positive benefits are noted in respect of a number of SA objectives: 1 – Housing, 3 - Education and skills, 4 – Health, 7 - Leisure and recreation and 18 – Employment.

However, this critique 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. Furthermore the site lies around 950 metres from existing facilities at Cranbrook. There is a timing issue at play in that some of 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.

Site Z2 is allocated for built development in the Cranbrook Plan as part of the Bluehayes expansion area under Policy CB2.

Commentary on suitability to accommodate gypsies and travellers

Site Z2 falls on the western/southern side of Station Road and to the north of London Road. The site could benefit from the proposed facilities that A1 would accommodate, though this would involve crossing Station Road. Site Z2 benefits from being in a fringe location and road access potential, directly from Station Road, would appear to be good. However, the road is narrow in places and additional use by large vehicles would not be preferential. It is not clear if acceptable highway access could be secured onto London Road. However, being a small site it is unlikely that a land owner would wish to bring the site forward for gypsy and traveller use, they typically could, instead, hold out for bricks and mortar residential values.

Site A2 has been identified for open space provision in the Cranbrook Plan and it is believed that there may be legal covenant or similar considerations that could prevent built development. The site was not explicitly assessed through the SA work (though was commented on) for the above reasons. It is not regarded as offering realistic scope to accommodate a gypsy and traveller site.

Conclusions on Comparative Assessment of Site Development Options

- 10.17 The site specific assessment shows a number of consistencies across all sites. All sites assessed through the appraisal are done so on the assumption of housing development (though also noting supplementary additional commentary specifically for gypsy and traveller accommodation) and therefore they all see positive impacts against SA objective 1 for housing, though as sites A1, B1 and G are of the greatest size, and account for the bulk of land allocated under Policies CB2, ~~CB4~~ **CB3** and ~~CB3~~**CB4** respectively, they all see significant positive impacts. The smaller sites would not accommodate so much housing, so taken individually their impacts are only recorded as positive in respect of SA objective 1. However, small sites group together or considered alongside and if developed as part of bigger comprehensive schemes, could attain the scale to warrant significant positive impacts. Policy CB5 for the Grange seeks to achieve collective delivery and if achieved this would indicate a significant positive collective impact for sites N, L1 and Y and the northern half of M taken as a single whole.
- 10.18 Further consistencies for positive impacts (and largest sites significant positive impacts) occur on many sites (but not all) against SA objectives 2 - Community services, 3 - Education and skills, 4 - Health, 7 - Leisure and recreation, 12 - Sustainable transport, 14 - Greenhouse gas emissions and the employment objectives of 18 - Employment, 19 - Town Vitality & viability and 20 - Inward investment. It is worth highlighting that the sites with greatest pedestrian accessibility, specifically shorter walking distances, to facilities and public transport, perform better against many of these objectives.
- 10.19 There are also some similar patterns for negative sustainability impacts occurring with larger sites, because being larger the scale of impact is greater, for example SA 17 - Waste, seeing significant negative impacts.
- 10.20 Where the greatest variations occur, and these are of particular significance in helping inform policy and allocation choices, are in respect of SA objectives 6 for noise and 9 for landscape character. Sites B2 because of proximity to the airport and H2 because of proximity to the railway line are identified as seeing significant adverse impacts against SA objective 6 for noise though other sites, close to noise sources that include the airport and main roads and railways also see potential for negative impacts. In respect of landscape impacts, SA Objective 9, a number of sites see significant negative impacts with these being on the southern side of Cranbrook, in many cases being exposed in open views from the south, and in a number of cases close to Rockbeare village. Sites with potential for significant negative impacts include B2, N (extended area), Q, R, S, T and X. All other sites see either negative (typically the bigger) or negligible (typically the smaller) landscape impacts. The only exception is site F which records a positive impact against SA objective 9 for landscape. This site, however scores a range of negatives against other SA objectives, specifically including 18 - Employment on account of loss of employment land, assuming a housing use comes forward.
- 10.21 The sites that are allocated for development in the Cranbrook Plan tabled below:

Table 10.1 sites allocated for development in the Cranbrook Plan

Allocation Policy	Sites Allocated	SA collective impacts and commentary for allocations	Excluded sites and commentary
CB2 - Bluehayes	A1, V, U and Z ₂	These sites form the Bluehayes allocation. They form a coherent area for development stretching between existing development of Cranbrook to the west and London Road to the east. They perform well against many of the SA objectives.	Sites close by that fall outside of the allocation and outside of the Built-up Area Boundary, Policy CB10 in the plan, includes land that is to the west of London Road, sites E, D and W as well as sites C and Z1. These sites were assessed as inappropriate for inclusion in the Built-up Area Boundary. It should also be noted that Site F which is remote, separated by the railway, is also excluded from the allocation and Built-up Area Boundary.
CB3 - Treasbeare	B1 (small parts of B2, and B3 and parts of T south west corner	These sites form the Treasbeare allocation. They form a coherent area for development to the south of Cranbrook but excluding the vast majority of Site B2 that falls at and above the 55 dB noise level. The area extends westward up to but not beyond a ridgeline prominent in views from Rockbeare village. The allocated sites perform well against many of the SA objectives.	Sites that fall close by but outside of the allocation and Built-up Area Boundary include T, R and S and most of site T. These sites are all visually prominent and development could adversely impact on the setting and open character that surround Rockbeare village.
CB4 - Cobdens	Site G (most westerly parts), H1 and K	These sites form the Cobdens allocation. They form a coherent area for development to the west of Cranbrook but do not intrude into land further to the west that is more undulating in character, more intimate in scale and more heavily planted. They perform well against many of the SA objectives.	Sites that fall close by but outside of the allocation and Built-up Area Boundary are I and J. These sites are quite remote from the built form areas for Cranbrook and site I is on more elevated land. Much of the western side of site G is excluded from the allocation, it forms undulating land of higher landscape value than land to the east.
CB5 - Grange	M (northern half), Y, L1 and N	These sites form the Grange allocation. They form a logical south easterly extension to Cranbrook that avoids adverse landscape impacts but that remains reasonably close to the town centre and main facilities of the town.	Sites that fall close by but outside of the allocation and Built-up Area Boundary are Q, P, O the extended part of N and southern half of M. These sites are of some visual openness and prominence, including from Rockbeare village but more generally from views from the south.

Scope for mitigation where negative impacts are noted

- 10.22 All of the allocated sites (and this, under the assessment, would hold true for any allocated land) show negative impacts against SA objective 17. It is identified that Cranbrook wide mitigation measures could be appropriate to deal with waste considerations.
- 10.23 Potential for adverse noise impacts, SA Objective 6, are also noted for all of the allocations, but these have the potential for the severest impacts for the CB3 Treasbeare allocation in respect of airport generated noise. Mitigation specific measures are mentioned in plan policy. Other noise concerns that could affect all other sites include road noise, especially from London Road, and also for CB2 Bluehayes and CB4 Cobdens the from the railway line. Provision of mitigation could feature in policy where noise may be a possible issue though it is noted that the masterplan minimises immediate road frontage and especially railway frontage development.
- 10.24 In respect of the CB2, CB3 and CB4 there are potential adverse historic environment impacts, SA objective 8, that mitigation in policy could address or reference. All of the allocations could, as well, result in some adverse landscape impacts, SA Objective 9, and mitigation measures could be identified in policy provision. This same observation also holds true (and would do so for any large allocation) for SA Objective 13 air, soil and water.
- 10.25 The sites identified for development through the Cranbrook work, specifically as allocated on the Policies Map, generally perform better in the sustainability assessment than those that are not identified.

Summary of cumulative SA impacts of the land allocations

- 10.25 This chapter of the appraisal has considered overall suitability of land allocations and land areas that fall inside of the Built-up Area Boundaries in the vicinity of the allocations. Overall the land allocations typically have lesser adverse sustainability impacts than the non-allocated sites, this is especially so 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.
- 10.26 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