

## East Devon Local Plan 2020 - 2040 – Preferred Options Consultation Draft

### Sustainability Appraisal Report

January 2023

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## 1. Introduction

- 1.1 Turley Sustainability has undertaken a review of the Sustainability Appraisal (SA) Report supporting the Regulation 18 East Devon Local Plan. This review has been undertaken on behalf of Bloor Homes South West Ltd and Stuart Partners Ltd who share significant land control within the area identified as Option 1 within the Local Plan, and who have been promoting this land as the “Denbow” New Community, which broadly accords with area assessed as Option 1. Within this review note these parties are referenced as the Consortium for ease.
- 1.2 These representations focus upon the Sustainability Appraisal supporting the Local Plan and specifically the scoring of the three different options for the new community.
- 1.3 The Consortium are pleased to provide their representations to the Council on the evidence base that guides the location and design of an exemplar new settlement that fully supports the transition to a net zero development.
- 1.4 The Consortium are aware of the importance of the Sustainability Appraisal to the soundness and legal compliance of the Local Plan and have provided these representations with the intention of enhancing the robustness of the SA and thus the local plan process.

## 2. A Review of the Regulation 18 Sustainability Appraisal

2.1 Section 5 of the SA contains the assessment matrices of the three different Options for the new settlement to the East of Devon. Each option was assessed against the SA Framework with suitable commentary provided against each of the assessment criteria.

2.2 In summary, the SA concluded that Option 1 is the most sustainable reasonable alternative for a new settlement for the following reasons:

- a. There is a greater certainty of delivery of Option 1 due to a large proportion of the land being promoted by a single entity.
- b. There is a greater potential to reduce carbon emissions from Option 1 due to the proposed Energy from Waste plant at Hill Barton and the potential to create a new heat network that supplies Option 1 and connects to the existing network serving Cranbrook and other major sites in the area.
- c. There are greater sustainable travel opportunities for Option 1 given its proximity to regular bus services, and Cranbrook train station.
- d. Option 1 is closer to the greatest range of existing employment opportunities at Exeter, Exeter Airport and the associated Airport Business Park, Skypark, and Exeter Science Park.
- e. Traffic modelling indicates that Option 1 has the least significant highways impact, and the initial 2,500 homes could be accommodated without significant highways interventions.

2.3 In total Option 1 scores four major positive sustainability benefits under the following objectives:

- a. Climate Change and Carbon
- b. Homes
- c. Jobs and Employment; and
- d. Connectivity and Transport.

2.4 The Local Plan identifies Option 3 as the next most sustainable settlement for a new community however the SA rejects this option as a reasonable alternative for the following reasons:

- a. A major negative biodiversity effect is given on the basis of its proximity to the Exe Estuary and greater overall risk to the ecological network
- b. With Option 3 there is the potential for settlement coalescence due to its proximity to Clyst St Mary, Ebford and Clyst St George in particular.
- c. A large proportion of the land in Option 3 is not currently promoted and therefore land ownership is unclear which threatens delivery.

- d. It is considered that Option 3 will have an adverse highways impact requiring significant mitigation including at Clyst St Mary roundabout.

2.5 The SA scoring does not award Option 3 any major positive benefits against the SA Framework compared to four major positives for Option 1 as summarised in Paragraph 2.3.

2.6 The Consortium have carefully reviewed this scoring and would support these conclusions. In particular we support the SA's reasons for the selection Option 1 as the most sustainable reasonable alternative for the reasons as set out in Paragraph 2.2.

2.7 The consortium also believe that there is additional evidence to further strengthen or support the high sustainability scoring of Option 1 which can be summarised as follows:

- a. Climate Change and Carbon: A Energy and Carbon strategy has been submitted with these representations which presents a concept level strategy to ensure Denbow fully supports the local plans objectives to deliver a net zero district by 2040. This strategy contains a range of measures to be deployed and considered beyond that identified by the SA. This further supports the **major positive impact**.
- b. With respect to the Jobs and Employment Option 1 contains the following employment opportunities in addition to those identified by the SA which further justifies its **major positive impact**:
  - Hill Barton Business Park which is located within the southern area of the site;
  - Greendale Business Park (1.5 miles); and
  - Sowton Industrial Estate (2.6 miles);

2.8 The Consortium do note however that option 1 has received a **major negative** score against the Landscape SA objective. Page 222 of the SA provides the detailed SA commentary to support this conclusion which is:

- a. *Unique sensitivities for Option 1 are the quality and integrity of the historic rural landscape and associated Holbrook river corridors flowing east-west through the option. As a result Option 1 is considered to have a high-medium landscape sensitivity.*

2.9 As part of these representations the Consortium have reviewed the CBRE Options Appraisal report which includes a review of the scoring with respect to Landscape Sensitivity. The Turley Review<sup>1</sup> of the CBRE Report contains an assessment by EDP<sup>2</sup> which concluded that there was limited evidence to justify Option 1 as having a Medium/ High landscape sensitivity and that all three Options should have a medium sensitivity. On this evidence the Consortium consider that the scoring for Option 1 against the Landscape SA objective should be reduced to a **minor negative**.

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<sup>1</sup> Options Appraisal for a Potential New Settlement [CBRE] – Review. Turley, January 2023. Paragraphs 3.2 - 3.5

<sup>2</sup> Options Appraisal for a Potential New Settlement [CBRE] – Review. Turley, January 2023. Appendix 1

## 3. Summary of the Review of The Sustainability Appraisal supporting the Regulation 18 Local Plan

- 3.1 The SA is a critically important evidence base supporting the Local Plan through the assessment of all reasonable alternatives to deliver the policy options and allocations. It is a legal requirement of the plan making process and an independent source of evidence to support the plan maker.
- 3.2 The Consortium consider that the SA supporting the Regulation 18 Local Plan is sound and has utilised a robust and transparent methodology to demonstrate that Option 1 is the most sustainable reasonable alternative for the delivery of a new community at East Devon.
- 3.3 The SA has correctly identified that Option 1 will result in a number of major positive sustainability impacts in key areas such as; Climate Change Mitigation, the provision of new Homes, Jobs and Employment opportunities and Connectivity and Transport.
- 3.4 The Consortium has provided further evidence to support these conclusions. Evidence has also been provided within this document and the wider Turley representations to justify an amendment to the major negative score for Landscape to a minor negative.