

# Cranbrook Plan DPD

## Sustainability Appraisal Adoption Statement



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# 1. Introduction

- 1.1 East Devon District Council adopted the Cranbrook Plan Development Plan Document (DPD) on 19 October 2022. The Cranbrook Plan builds on Strategy 12 of the Local Plan, refining allocations previously identified as well as allocating additional land to ensure that the full quantum of housing and infrastructure required under Strategy 12 is addressed. The DPD also provides for a suite of policies to be introduced that are specifically targeted at Cranbrook and its expansion to allow the town to develop in a structured and coordinated way.
- 1.2 The Cranbrook Plan is accompanied by a Sustainability Appraisal (SA) Report which is a statutory requirement when preparing a DPD. The SA involves appraising the likely significant social, economic and environmental effects of options and policies in the plan against a set of sustainability objectives.
- 1.3 Strategic Environmental Assessment (SEA) is also a statutory process required under the European SEA Directive, transposed into UK law by the SEA Regulations. The Government recommend that these two statutory requirements (SA and SEA) are addressed by carrying out a single process of Sustainability Appraisal. This approach has been followed in undertaking SA of the Cranbrook Plan.
- 1.4 This SA post-adoption statement satisfies the SEA Regulations, by explaining:
  - How sustainability considerations have been integrated into the Cranbrook Plan
  - How the SA Report has been taken into account
  - How the results of consultation have been taken into account
  - Reasons for choosing the adopted Cranbrook Plan as adopted, in light of reasonable alternatives
  - Measures to monitor the significant sustainability effects of the Cranbrook Plan

## 2. How sustainability considerations have been integrated into the Cranbrook Plan

2.1 SA (incorporating SEA) has been carried out as an iterative and ongoing process alongside the Cranbrook Plan. The SA findings have been documented at each key stage of preparing the Plan, from the Issues and Option stage in June and July 2016 to the Main Modifications consultation in January 2022. This has ensured that sustainability considerations have been fully integrated into the Cranbrook Plan at all stages of preparation. Figure 2.1 below sets out the SA framework, which was derived at the outset of the SA work and has been referenced at each stage of the plan making process. It also identifies the SEA topic(s) covered by each objective.

**Figure 2.1: Sustainability Appraisal framework for the Cranbrook Plan**

SA Objectives	Relevant Topic(s) covered, as set out in the SEA Regulations
1. To ensure everybody has the opportunity to live in a decent home.	Population, human health, material assets.
2. To ensure that all groups of the population have access to community services.	Population, human health, material assets.
3. To provide for education, skills and lifelong learning	Population, material assets.
4. To improve the population's health	Population, human health.
5. To reduce crime and fear of crime.	Population, human health.
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	Population, human health.
7. To maintain and improve cultural, social and leisure provision.	Population, material assets.
8. To maintain and enhance built and historic assets and their settings.	Cultural heritage including architectural and archaeological heritage.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	Soil, landscape.
10. To maintain the local amenity, quality and character of the local environment.	Fauna, flora, soil, water, air, landscape.
11. To conserve and enhance the biodiversity of East Devon.	Biodiversity, fauna, flora.
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	Human health, air.
13. To maintain and enhance the environment in terms of air, soil and water quality.	Soil, water, air.
14. To contribute towards a reduction in local emissions of greenhouse gases.	Air, climatic factors.
15. To ensure that there is no increase in the risk of flooding.	Water, human health, material assets.
16. To ensure energy consumption is as efficient as possible.	Climatic factors.

<b>SA Objectives</b>	<b>Relevant Topic(s) covered, as set out in the SEA Regulations</b>
17. To promote wise use of waste resources whilst reducing waste production and disposal.	Material assets.
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	Population, material assets.
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	Population, material assets.
20. To encourage and accommodate both indigenous and inward investment.	Population, material assets.

- 2.2 The final allocations for the town together with reasonable alternative land areas were subject to SA; along with the policies in the Plan. A range of different sustainability impacts were identified. The impacts identified are diverse and where these were noted as negative the scope for and range of potential mitigation has been identified.
- 2.3 This integration of sustainability considerations into the Cranbrook Plan has been crucial in documenting the sustainability effects of the plan, and showing that it is the most appropriate strategy in light of reasonable alternatives.

### 3. How the Sustainability Appraisal Report has been taken into account

#### Introduction

- 3.1 As previously highlighted, the iterative nature of carrying out Sustainability Appraisal (SA) meant that sustainability findings were documented at each stage of preparing the Cranbrook Plan. SA Reports described the approach taken and the effects identified, with recommendations to avoid or minimise negative effects or enhance positive effects. This chapter explains how the SA findings were taken into account when preparing the Cranbrook Plan.
- 3.2 The key preparation stages and the relationship between the Cranbrook Plan and SA process discussed above are outlined in figure 3.1. This shows the SA documents that have been taken into account in preparing the Plan. Web links to the documents are included for ease of reference. Further detail on each stage follows figure 3.1.

Figure 3.1: Villages Plan and Sustainability Appraisal – key stages of preparation

Plan iteration Accompanying SA work	Plan iteration Accompanying SA work
	SA <a href="#">Scoping letter</a> <sup>1</sup> (September 2015) sent to the consultation bodies (Environment Agency, Natural England, Historic England) for comments by 30 October 2015
<a href="#">Cranbrook Plan Issues and Options</a> <sup>2</sup> Consultation June – July 2016	<a href="#">SA report</a> <sup>3</sup> of the Cranbrook Plan Issues and Options Report, Consultation June – July 2016
Cranbrook Plan Preferred Approach consultation with <a href="#">Masterplan</a> <sup>4</sup> and <a href="#">policy framework</a> <sup>5</sup> December January 2017/2018	<a href="#">SA of the Cranbrook Masterplan</a> <sup>6</sup> and supporting policy document consultation December January 2017/2018

<sup>1</sup> <https://eastdevon.gov.uk/media/1321611/cranbrook-sea-scoping-letter.pdf>

<sup>2</sup> <https://eastdevon.gov.uk/media/2218860/cranbrook-io-160609-final-lr.pdf>

<sup>3</sup> <https://eastdevon.gov.uk/media/1762544/6596-cranbrook-sa-report.pdf>

<sup>4</sup> <https://eastdevon.gov.uk/media/2271420/d-170928-masterplan-document-title-update.pdf>

<sup>5</sup> <https://eastdevon.gov.uk/media/2271753/cranbrook-plan-dpd-policy-appendix.pdf>

<sup>6</sup> <https://eastdevon.gov.uk/media/2263289/sa-of-cranbrook-masterplan-oct-2017-ver-04.pdf>

<a href="#">Cranbrook Plan Pre submission</a> <sup>7</sup> consultation March - April 2019	<a href="#">SA of the Publication (Pre submission) version</a> <sup>8</sup> consultation March - April 2019
<a href="#">Cranbrook Plan Proposed main modifications</a> <sup>9</sup> consultation January February 2022	<a href="#">SA report</a> <sup>10</sup> updated to incorporate proposed main modifications consultation January – February 2022

### Scoping

3.3 The SA process began in October 2015 with the scoping stage. This set out the baseline information relevant to the Cranbrook Plan, alongside the policy context, key sustainability issues, and the SA framework (shown in figure 2.1) against which plan options and policies would be appraised.

### Issues and Options and Preferred approach

3.4 These early stages within the plan making process set out alternative options and then refined these through the non-statutory preferred approach consultation. They allowed consultation and engagement with stakeholders and other interested groups and individuals on the approach being taken. They also allowed for appraisal against the SA objectives and the exploration of alternatives and mitigation.

### Proposed Submission

3.5 The 'proposed submission' Cranbrook Plan (March 2019) included a 'final', Built up area boundary for the settlements of Cranbrook and Broadclyst Station, and Strategic policies for the allocation of all necessary land for the expansion of the town. Further strategic policies dealt with matters concerning infrastructure delivery, phasing and delivery of zero carbon developments, affordable housing and Suitable Alternative Natural Green Space (SANG) land. Development management policies also addressed more detailed design matters that affect the delivery of the urban expansion.

3.6 The accompanying SA Report (and non-technical summary) again contained the methodology and sustainability context.

<sup>7</sup> <https://eastdevon.gov.uk/media/2810797/cranbrook-plan-dpd-submission-draft.pdf>

<sup>8</sup> <https://eastdevon.gov.uk/media/2761733/sustainability-appraisal-of-publication-of-cranbrook-plan.pdf>

<sup>9</sup> <https://eastdevon.gov.uk/media/3723760/main-modifications-schedule.pdf>

<sup>10</sup> <https://eastdevon.gov.uk/media/3723762/sa-of-cranbrook-plan-with-pmm.pdf>

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- 3.7 The SA Report presented findings for each of the prescribed policies as well as identified parcels of land available for the final allocations, considering 'reasonable alternatives' where appropriate. These findings were used to inform the Plan, with the best performing parcels of land in the SA taken forward in the Plan for allocation.
- 3.8 The Cranbrook Plan and SA Report were then submitted for Examination by a Planning Inspector in August 2019.

#### Schedule of Proposed Modifications

- 3.9 Following the Examination hearing sessions (held in January and February 2020 and November 2020), a schedule of main modifications to the Cranbrook Plan was required. The SA Report and non-technical summary were updated to incorporate the main modifications, identifying the likely significant effects that would arise as a result.
- 3.10 Public consultation took place on the updated SA (and non-technical summary) alongside the schedule of main modifications to the Cranbrook Plan

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## 4. How the results of the consultation have been taken into account

### Introduction

- 4.1 As set out in the previous chapter, an SA Report was published for consultation alongside the Cranbrook Plan at key stages of its preparation. This chapter provides an overview of the results of consultation on the various SA documents, and how they have been taken into account. There were no requests from another EU Member State on potential transboundary effects, so consultation of this nature was not required.

### Scoping

- 4.2 A scoping letter was sent to the 'consultation bodies' (Environment Agency, Natural England, and Historic England) in September 2015. Responses were received from each of the three organisations, together with other stakeholders comprising the National Trust, David Lock Associates, Network Rail, Paul Smith, Equality and Humans Rights Commission and South West Water. Collectively these responses resulted in a number of amendments, including the expansion of baseline information to refer to local designated biodiversity sites, corrections to the reference to Killerton, and the need to better consider its setting, and the need to refer to the Water Framework Directive.
- 4.3 The detailed points raised on the scoping letter, and how they were addressed, are in Appendix 1 of the Issues and Options SA Report.

### Issues and Options and Preferred approach

- 4.4 Public consultation on the Cranbrook Plan Issues and Options and Subsequently preferred approach took place June – July 2016 and December January 2017/2018 respectively. An SA Report was published for consultation alongside each of the Plan making stages.
- 4.5 Over these two rounds of consultation there was good public engagement and feedback although much of this focussed on the Policy framework and detailed proposal rather than the SA.
- 4.6 There were a small number of matters raised specifically in regard the SA with some relating to matters of detail or accuracy.
- 4.7 The Environment Agency specifically requested that the SA made particular reference to the topic climate change, flooding and coastal change and address the matter of flooding, and the predicted impacts of climate change upon flooding, in a forthright manner. To address this Chapter 3, was updated to more explicitly refer to flooding considerations and SA Objective 15 similarly reviewed.

### Proposed Submission Version

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- 4.8 Only three consultee responses made specific comments on the SA Report published for consultation alongside the 'proposed submission' Cranbrook Plan. These considered that the SA did not reflect social environmental and economic factors with any detailed information, highlighted additional justification being needed for the built up area boundary and criticised the approach taken to only allocate employment land at Treasbeare as well as the proposed location and distribution of gypsy and traveller pitches.

#### Schedule of Proposed Main Modifications

- 4.9 An SA Report was published alongside the Schedule of Main Modifications. Three responses identified comments that were specifically targeted at the SA. The first of these considered that there had been no evidence that the process of community involvement had been complied with; that previous concerns by EDNCP had not been addressed and that the SA did not comply with the Duty to cooperate. On reflecting on these the Council considered that through the evolution of the Plan and with an updated and comprehensive SA being produced at each stage, these criticisms did not need to be specifically addressed in any future revision
- 4.10 The second considered that the flood risk attributed to Treasbeare was inaccurate. While this comment was noted and needs to be considered through future development management work, it did not undermine the veracity of the SA and strategic level plan that the SA accompanied.
- 4.11 Finally there was criticism that a small part of the Cobdens allocation to the west of Southbrook Lane had not been considered through the SA land parcel appraisals. This was land that was already allocated within the existing Development Plan (East Devon Local Plan) and had been wrongly identified as already benefiting from Planning Permission within the SA.
- 4.12 Site assessment was therefore undertaken for this parcel and the results shared with the Inspector. In her final letter to the Council, Mrs Wilson set out that "*the existence of the allocation in the [East Devon Local Plan] made it clear that this land would be acceptable for development and EDDCs approach to resolve this matter is, in my view, an appropriate and proportionate one*". To fulfil the approach set out by the Inspector East Devon included the additional site assessment within the final SA that accompanies the adopted version of the Plan.

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## 5. Reasons for choosing the adopted Cranbrook Plan in light of reasonable alternatives

### Introduction

- 5.1 Developing alternatives for the Cranbrook Plan was an iterative process, involving public consultation and assessing effects through the SA. The underlying policy context had already been set by the Local Plan, although due to the nature of planning for a major urban extension, the scope was still fairly extensive, looking at existing and proposed allocations and a suite of additional policies.
- 5.2 It is important to note that alternatives (also referred to as 'options') need to be "reasonable" – this broadly means different realistic and deliverable options in developing policies, which are sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.

### Strategic Options

- 5.3 'Strategic options' for the expansion of the Town considered four different overall approaches to growth – set out as 4 scenarios within the Issues and Options consultation. These considered
- a. Scenario 1 - Current density and development within areas subject to noise levels above recommended limits
  - b. Scenario 2 - Current density and development in Neighbourhood Plan areas
  - c. Scenario 3 - Increased average density to 45dph and development within sensitive landscape areas and areas subject to noise levels above recommended limits
  - d. Scenario 4 - Increased average density to 45dph and some land within Neighbourhood Plan areas
- 5.4 While it was identified through SA testing that all four scenarios would result in the same amount of housing development (SA objective 1) Scenarios 1 and 3 would place development in areas that are adversely affected by noise from Exeter Airport. It was recognised that this could compromise the quality of housing developed in those areas.
- 5.5 In general the effects of Scenario 4 on the SA objectives were considered broadly more positive than those of the other three scenarios. Many of the sustainability effects of the scenarios are influenced by the likely density of development, with the higher density development proposed under Scenarios 3 and 4 having generally more positive effects than the more dispersed and lower density development that would result from Scenarios 1 and 2. However, the effects of Scenario 3 are less positive than Scenario 4 because it would steer development to areas of high noise levels which could adversely affect a number of the sustainability objectives

### Master plan exercise

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- 5.6 Building on the scenarios that were set out above, assessed under the SA and consulted upon, master planning work was then undertaken to understand in more detail how development (both housing and infrastructure) could be distributed around the town whilst maximising the positive SA benefits.
- 5.7 This work was informed by a large number of technical evidence papers from various specialisms including noise, drainage, community development and employment. These pieces of work helped to inform and shape what was realistically possible whilst working with the preferred scenarios identified at the start of the journey. This approach led to a desire to undertake a preferred approach consultation. It provided an opportunity to formally consult on the emerging plan and distribution of development also to reappraise the approach against the SA objectives.
- 5.8 To help structure this part of the exercise 7 masterplan design principles were set out comprising:
- Principle 1: Compact urban form
  - Principle 2: Higher density housing and amenities close to the key movement corridors
  - Principle 3: Strong links between Cranbrook, Cranbrook station and employment areas
  - Principle 4: The identity of Cranbrook shall be informed by landscape features and character
  - Principle 5: Attractive pedestrian and cycle routes for commuting and leisure
  - Principle 6: Integration with public transport
  - Principle 7: Health provision
- 5.9 These principles were assessed against SA objectives and recorded largely neutral or positive benefits – as such they were taken forward

#### Alternative sites

- 5.10 Assessment of alternative sites and land development options was undertaken at the same time as the SA testing of the masterplan and reinforced the suitability of the Scenario 4 approach to development.

#### Areas of Policy

- 5.11 Areas of policy were also identified and included within the same consultation. At this stage the policies were not drafted in full but identified key areas which were considered likely to be needing specific policy consideration. These were subject to the same SA process as the masterplan and duly assessed against the objectives outlined. Alternative approaches were considered as part of this approach but in a

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number of cases a do nothing approach was considered as the most relevant alternative option. These are set in out in full within the SA.

#### Refinement

- 5.12 The Plan and its Policies Map were subsequently drafted in full, and refined as a result of the consultation, updated in advance of the pre submission consultation and the finally completed through the examination and proposed main modifications which were themselves subject to SA work.
- 5.13 The single most significant change to the allocation affected land to the south east of the expansion area where the allocation shifted eastwards away from Rockbeare. In SA terms the scoring was not dissimilar through this shift. It did however allow for the perception of settlement identity to be strengthened which is an important social and cultural consideration.
- 5.14 The main modification process made a number of changes to the precise wording of policy although save for the deletion of Policy CB10 (safeguarding of station land) which was subsumed into CB9, the changes had little impact on the SA scoring.

## 6. Measures to monitor the significant sustainability effects of the Cranbrook Plan

### Introduction

- 6.1 Monitoring the significant sustainability effects of implementing the Cranbrook Plan can help identify any unforeseen adverse effects at an early stage, enabling remedial action to be taken if required. Monitoring should be focussed on the significant effects, rather than trying to monitor everything
- 6.2 The indicators for monitoring the sustainability effects of the Cranbrook Plan are set out in the following table.

Figure 6.1: Indicators for monitoring the sustainability effects of the Villages Plan

SA objectives for which potential significant effects have been identified	Suggested indicators
1. To ensure everybody has the opportunity to live in a decent home.	<ul style="list-style-type: none"> <li>• Number of new homes built annually within the town.</li> <li>• Percentage of all new homes delivered in the town that are affordable.</li> </ul>
2. To ensure that all groups of the population have access to community services.	<ul style="list-style-type: none"> <li>• Amount of community services delivered within Cranbrook including GP and school places.</li> </ul>
3. To provide for education, skills and lifelong learning to: <ol style="list-style-type: none"> <li>meet the needs of the local population, and</li> <li>meet local employment needs.</li> </ol>	<ul style="list-style-type: none"> <li>• Number of new work-based apprenticeships offered in the town annually.</li> <li>• Number of new school places created in the town annually.</li> </ul>
4. To improve the population's health.	<ul style="list-style-type: none"> <li>• Levels of walking and cycling for commuting to and from Cranbrook.</li> </ul>
5. To reduce crime and fear of crime.	<ul style="list-style-type: none"> <li>• Number of crimes reported annually in the town.</li> </ul>
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	<ul style="list-style-type: none"> <li>• Number of noise pollution incidents reports annually in Cranbrook.</li> </ul>
7. To maintain and improve cultural, social and leisure provision.	<ul style="list-style-type: none"> <li>• Percentage of eligible open spaces managed to green flag award standard.</li> </ul>
8. To maintain and enhance built and historic assets.	<ul style="list-style-type: none"> <li>• Number of heritage assets within proximity of Cranbrook on the 'Heritage at Risk Register'.</li> </ul>
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	<ul style="list-style-type: none"> <li>• Percentage of new development taking place on high quality agricultural land.</li> </ul>
10. To maintain the local amenity, quality and character of the local environment.	<ul style="list-style-type: none"> <li>• Number of complaints made to EDDC regarding noise pollution in Cranbrook.</li> </ul>

SA objectives for which potential significant effects have been identified	Suggested indicators
11. To conserve and enhance the biodiversity of East Devon.	<ul style="list-style-type: none"> <li>• Change in areas and populations of biodiversity importance, including (i) change in priority habitats and species (by type); and (ii) change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional significance (changes arising from development, management and planning agreements, in hectares and numbers of priority species type).</li> <li>• Amount of SANGs delivered.</li> </ul>
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	<ul style="list-style-type: none"> <li>• Frequency of bus services in the town.</li> <li>• Frequency of rail services in the town.</li> <li>• Levels of bus and rail patronage.</li> </ul>
13. To maintain and enhance the environment in terms of air, soil and water quality.	<ul style="list-style-type: none"> <li>• Number of declared Air Quality Management Areas (AQMAs) in the town.</li> </ul>
14. To contribute towards a reduction in local emissions of greenhouse gases.	<ul style="list-style-type: none"> <li>• Renewable energy capacity installed by type.</li> <li>• Renewable energy generation in kWh by type over a monitoring period</li> </ul>
15. To ensure that there is no increase in the risk of flooding.	<ul style="list-style-type: none"> <li>• Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.</li> </ul>
16. To ensure energy consumption is as efficient as possible.	<ul style="list-style-type: none"> <li>• Renewable energy capacity installed by type.</li> </ul>
17. To promote wise use of waste resources whilst reducing waste production and disposal.	<ul style="list-style-type: none"> <li>• Volume of waste generated in the town annually.</li> <li>• Percentage of waste generated in the town that is recycled.</li> </ul>
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	<ul style="list-style-type: none"> <li>• Amount of land (defined by completed sqm gross floorspace) developed for employment by type.</li> </ul>
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	<ul style="list-style-type: none"> <li>• Amount of completed retail development in the town centre.</li> </ul>
20. To encourage and accommodate both indigenous and inward investment.	<ul style="list-style-type: none"> <li>• Amount of land (defined by completed SqM gross floorspace) developed for employment by type.</li> </ul>

End.