

**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

**Common Ground agreed between:**

**East Devon District Council**

**East Devon New Community  
partners**

**Signed by:**



*Strategic Lead (LBC, Business + Democratic Services)*

**Dated:** *19 June 2018*

**Signed by:**



**(Partner)**

**On behalf of David Lock  
Associates Ltd**

**Dated:** 17 June 2015

## 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:

- 6,300 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 Tithebarn 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 Tithebarn Link Road under construction and the remainder of the link road committed and to be completed

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.

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
RM applications	January 2011
RM 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.

- 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 Clyst Honiton 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 master 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
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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 Whimble (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) (CD/Gen009), 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.

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

timely fashion to allow EDDC to consider each application at Committee before the end of 2015.

#### **Consultation on Application Process and Issues Arising**

- 3.8 The applications were validated on 10 March 2015. 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 EDDCs 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);

- 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.

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.



- 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;

- 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 Treasbeare 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.

**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.