

Statement for the examination of the Cranbrook DPD

Response to the Inspectors Matters Issues and
Questions

Matter 4: Bluehayes Expansion Area

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Issue 7: Is the Allocation (Policy CB2) positively prepared, justified and effective?

Response	Inspectors Question(s)
<p>1.1 Is the proposed housing allocation deliverable and / or developable in accordance with the housing trajectory? In particular, is it:</p> <p style="padding-left: 40px;">a) Confirmed by the landowner involved as being available for the use proposed?</p> <p style="padding-left: 40px;">b) Supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?</p> <p style="padding-left: 40px;">c) Deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?</p>	<p>Q49 – Deliverability of allocation with regard to land ownership, access and constraints</p>
<p>1.2 Available for the proposed use</p>	
<p>1.3 The proposed western expansion area of Cranbrook is allocated for residential led mixed used development in the adopted East Devon Local Plan 2013-2031, adopted on 28th January 2016.</p>	
<p>1.4 The Local Plan provides for strategic growth and expansion to Cranbrook in this location as part of East Devon’s West End Strategy set out under Local Plan strategy 9. Cranbrook is also identified as a</p>	

- major new East Devon market town and Local Plan Strategy 12 allocates land to provide up to 6,300 new homes on allocation sites to the west and east of the town.
- 1.5 The adopted Local Plan was subject to a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) and was subject to Examination in public. The Bluehayes expansion area was included in the Local Plan having regard to the assessments made.
- 1.6 The expansion area is shown as W144B on the New East Devon Local Plan 2013 – 2031 [West End Inset Map January 2016](#)¹.
- 1.7 Strategy 12 of the East Devon Local Plan requires that Developments at Cranbrook shall be developed in a phased and co-ordinated manner alongside the required infrastructure. Strategy 12 makes provision for parameter plans that are required and expected to form part of a plan for Cranbrook, are to be developed in partnership with the developers and the community, and ultimately inform a Development Plan Document.
- 1.8 The Cranbrook Plan area within the Local Plan also identified land for the further expansion/intensification of Cranbrook to accommodate a further 1,550 houses and associated jobs, social, community and education facilities and infrastructure outside of the designated Neighbourhood plan areas of Rockbeare, Broadclyst and Clyst Honiton.
- 1.9 The current proposed housing allocation comprising Bluehayes is under the control of four separate landowners. The land owners have

¹ <https://eastdevon.gov.uk/media/1462373/new-local-plan-west-end-jan-2016-final.pdf>

made it known to the Council that the land is available through the Strategic Housing Land Availability Assessment process or through written representation during the DPD consultations. Two developers and their agent have been actively involved in the promotion of the majority of the site for development, and have attended various meetings with the Local Planning Authority (LPA). Their interest excludes relatively modest areas of the allocated land to north and south of the main allocation. These areas do however remain available.

- 1.10 In addition and with reference to post submission documents ([PSD2](#))² there are two applications for outline permission, that have previously been submitted by the same landowner/agent, and which further evidence the interest in delivering that part of the site by developers.
- 1.11 At this time, no statement of Common Ground has been agreed between the Local Planning Authority and the current applicants, however, the applicants and their agent continue to have ongoing meetings with the Local Planning Authority with regard to progressing the most recent application submission held under reference 19/0620/MOUT.
- 1.12 **Access**
- 1.13 The Cranbrook plan is supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided to serve the Bluehayes expansion allocation.

² <https://eastdevon.gov.uk/media/3454581/psd2-planning-application-summary-november-2019.pdf>

- 1.14 Throughout the development of the DPD, an assessment has been made in consultation with Devon County Council Highway Authority with regard to the accessibility of the Bluehayes Expansion area and the transport and movement around the site. Following this assessment a [movement strategy](#)³, illustrating a primary vehicle route for the Bluehayes expansion area has been included within the [Cranbrook Masterplan](#)⁴ (figure 2.1 Movement). This includes land within the Bluehayes Expansion area which currently forms part of the property known as Coachfield House. The Vehicle access strategy is further supported through the Cranbrook masterplan [movement strategy](#). Para 6.2 of this document illustrates the key points of the vehicular access strategy for the development, including proposed improvements to the B3174 London Road/Station Road junction which are considered to remain viable and deliverable options to secure a safe and suitable access to the Bluehayes expansion area.
- 1.15 The current planning application before the LPA (19/0620/MOUT) sets out an alternative access arrangement from the Cranbrook masterplan.
- 1.16 The application proposes a new roundabout to serve the expansion area which would be located to the west of the existing Younghayes roundabout. Station Road is proposed to be diverted through the expansion area with a new access through the development situated off of Station Road and adjacent to Shercroft Close. The main route is proposed to extend through the development to the Railway Station, linking the expansion allocation with the existing public rail links and Burrough Fields Road.

³ https://eastdevon.gov.uk/media/3264903/cran065-190801_transport-and-movement-addendum.pdf

⁴ <https://eastdevon.gov.uk/media/2780127/cranbrook-masterplan-2019.pdf>

- 1.17 Following discussions with Devon County Council Highways Authority, the application proposals put forward to date are considered to be acceptable in principle. Work has been carried out by the applicant's consultants WSP that demonstrates that the access arrangements proposed would be a suitable alternative, and that a safe and appropriate access for pedestrians and vehicles could be achieved in the locations shown on the submitted parameter plan. However, discussions are ongoing with regard to the technical detail and the full extent of the works required.
- 1.18 The Local Planning Authority and Devon County Council Highways Authority are yet to fully establish whether the access proposals, being considered as part of the application submission, could be reasonably brought forward.
- 1.19 The work carried out by the applicants has recently been supported by the submission of a technical note to the current planning application. This document was submitted by WSP and received by EDDC on 20th December 2019. The technical note aims to identify a possible solution and to demonstrate that the western expansion allocation could be delivered from a highways and transport perspective without precluding the delivery of other areas.
- 1.20 The technical note is currently being reviewed by Devon Council Highway Authority and further discussions are needed before comment on the document can be provided.
- 1.21 Previously suggestions have been made about a potential pedestrian bridge linking Bluehayes and Treasbeare, and land on both sides of

the London Road has been identified together with a capital costs towards the provision of such within the [Cranbrook IDP](#)⁵. An area of reserved land for a pedestrian bridge has also been set aside for consideration on the parameters plan submitted to accompany application 19/0620/MOUT ([PDS2](#))⁶.

1.22 Work is continuing to understand the need for such a bridge and whether desire lines can be established which allow safe crossing points for pedestrians which are at grade. Such points are inherently better used if they can be provided and would up a considerable sum within the IDP.

1.23 **Constraints**

1.24 The western expansion area is bounded to the north by the railway line and Cranbrook Station, residential properties within the Station Yard and along Railway Terrace, and the Hungry Fox estate including a mix of office units and trading units beyond. A variety of housing is located along Station Road to the western boundary. To the south is the London Road (former A30) frontage including detached properties. To the east the site is bounded in part by Blue Hayes Lane leading to Blue Hayes House parkland area with large specimen trees which are included in the application area.

1.25 Bluehayes is considered to be the least constrained of the allocated expansion areas with opportunities for higher densities and the incorporation of Blue Hayes park, an existing and mature landscape setting. However, delivery of development at Bluehayes is not

⁵ <https://eastdevon.gov.uk/media/2761724/cranbrook-infrastructure-delivery-plan.pdf>

⁶ <https://eastdevon.gov.uk/media/3454470/appendix-b3-19-0620-parameters-plan.pdf>

without constraints. It is considered that Bluehayes allocation has three key constraints – comprising the existing road infrastructure and highway network, which includes London Road B3174 linking the whole of Cranbrook between Exeter and Whimble and Station Road which forms a main link road between London Road and Broadclyst and the associated impact on wider highway network; drainage associated with the levels across the site which slope gently toward the northern parcels and areas designated as flood zone 2 and 3; and the impact on important trees and hedgerows within and surrounding the site area.

1.26 Evidence set out in the following documents demonstrates that with careful layout and phasing of development the constraints can be overcome so that they do not present an insurmountable limitation to development

Cran 026 - <https://eastdevon.gov.uk/media/2262530/cranbrook-masterplan-movement-strategy-rev-d.pdf>

Cran 065 - https://eastdevon.gov.uk/media/3264903/cran065-190801_transport-and-movement-addendum.pdf

Cran 051 - <https://eastdevon.gov.uk/media/2760821/Landscape-and-Visual-Appraisal-of-Revised-Proposals.pdf>

Cran 016 - <https://eastdevon.gov.uk/media/2272406/cranbrook-drainage-strategy-draft.pdf>

Cran 017-
https://eastdevon.gov.uk/media/2763279/18110001601_flood-risk-review-and-sw-drainage-strategy_b0_12-feb-2019.pdf

<p>1.27 Other environmental considerations have been addressed through the plan, policy and in developing the masterplan such that development on the Bluehayes site is deliverable.</p>	
<p>1.28 Has full consideration been given to the impact of this allocation on:</p> <ul style="list-style-type: none"> a) Access arrangements b) Flood risk and surface water drainage including flood routes adjacent to the railway line. c) Landscape and settlement character. d) The living conditions of existing residents. e) An appropriate buffer to properties at Broadclyst Station. 	<p>Q50 – Consideration in respect of access, flood risk, landscape, amenity and the identity of Broadclyst Station</p>
<p>1.29 Access arrangements</p>	
<p>1.30 Access to the allocation is considered to be good, with three main access points into the site, one off London Road, a route off Station Road and a further route from the existing railway station. What is more difficult at this stage is the pedestrian connection between Cranbrook phase 1 and the expansion area and although it is considered that this could be achieved, there are exiting constraints on the potential for a connection across Blue Hayes Lane, which would be desirable, however such a connect is not currently available.</p>	
<p>1.31 In any case it is a requirement of Cranbrook plan policy CB2 that planning applications for development parcels within the Bluehayes expansion area must provide pedestrian, cycling and vehicular access up to the boundaries of the parcel/s so as to ensure that adequate links between parcels are provided in the interests of facilitating a comprehensive movement network. This includes</p>	

providing links between parcels in different ownership or control and ensuring that land is available to facilitate connection with development in the Treasbeare Expansion Area (CB3).

- 1.32 Throughout the development of the DPD, an assessment has been made in consultation with Devon County Council Highway Authority with regard to the accessibility of the Bluehayes Expansion area and the transport and movement around the site. Following this assessment a [movement strategy](#)⁷, illustrating a primary vehicle route for the Bluehayes expansion area has been included within the [Cranbrook Masterplan](#)⁸ (figure 2.1 Movement). This includes land within the Bluehayes Expansion area which currently forms part of the property known as Coachfield House. The Vehicle access strategy is further supported through the Cranbrook masterplan [movement strategy](#). Para 6.2 of this document illustrates the key points of the vehicular access strategy for the development, including proposed improvements to the B3174 London Road/Station road junction which are considered to remain viable and deliverable options to secure a safe and suitable access to the Bluehayes expansion area.
- 1.33 The current planning application before the Local Planning Authority sets out an alternative access arrangement from the Cranbrook masterplan.
- 1.34 Following discussions with Devon County Council Highways Authority, the application proposals put forward to date are considered to be acceptable in principle. Work has been carried out by the applicant's consultants WSP that demonstrates that the access

⁷ https://eastdevon.gov.uk/media/3264903/cran065-190801_transport-and-movement-addendum.pdf

⁸ <https://eastdevon.gov.uk/media/2780127/cranbrook-masterplan-2019.pdf>

arrangements proposed would be a suitable alternative, and that a safe and appropriate access for pedestrians and vehicles could be achieved in the locations shown on the submitted parameters plan. However, discussions are ongoing with regard to the technical detail and the full extent of the works required.

- 1.35 The Local Planning Authority and Devon County Highways Authority are yet to fully establish whether the access proposals being considered, as part of the application submission, could be reasonably brought forward.
- 1.36 The work carried out by the applicants has recently been supported by the submission of a technical note to their current planning application. This document was submitted by WSP and received by EDDC on 20th December 2019. The technical note aims to identify a possible solution and to demonstrate that the western expansion allocation could be delivered from a highways and transport perspective without precluding the delivery of other areas.
- 1.37 The technical note is currently being reviewed by Devon County Council Highways Authority and further discussions are needed before comment on the document can be provided.
- 1.38 **Flood risk**
- 1.39 When preparing the DPD and development options for the Bluehayes allocation the Local Planning Authority commissioned Golder Associates (UK) Ltd to undertake a flood risk review and Surface

water drainage strategy for the site (evidence document [Cran017](#)⁹). The scope of the work consisted of a review of the legislation, policy and supporting documents in relation to surface water drainage. This included a review of all sources which may cause or increase the risk of flooding to the development and the local vicinity including fluvial, pluvial and groundwater sources, and sewers and man-made infrastructure, the identification and examination of the residual flood risk to the proposed development and neighbouring areas from these sources.

- 1.40 The report was prepared in accordance with the requirements as set out in the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG), EA guidance on Flood Risk Assessments, The SuDS Manual C753 (CIRIA 2015), and the Non-Statutory Technical Standards for Sustainable Drainage (Department of Environment, Food and Rural Affairs, March 2015)
- 1.41 The outcome of the report was used to inform the masterplan. The masterplan remains a guide for development and demonstrates the drainage constraints and principles that need to be employed across the allocation.
- 1.42 The surface water drainage and flood routes along the railway line are known and it is considered that, at the time of a detailed application, that an appropriate and detailed drainage design could be secured to improve existing surface water flooding difficulties in the area. Overall it is considered that proper consideration has been given to this through the allocation and supporting masterplan work.

⁹ https://eastdevon.gov.uk/media/2763279/18110001601_flood-risk-review-and-sw-drainage-strategy_b0_12-feb-2019.pdf

1.43 **Landscape and settlement character.**

1.44 The Local Planning Authority commissioned Hankinson Duckett Associates (HDA) to undertake a landscape and visual impact appraisal for the proposed allocation site.

1.45 The approach to the landscape and visual appraisal is based upon the latest guidance, and upon HDA's extensive practical experience of assessment work. HDA's methodology for Landscape and Visual Impact Assessment is set out within appendix 1 of HDA's report which itself form part of the plans evidence base and has been submitted as document Cran032 – Cran 051 (Inclusive). The main written report documents are found as [Cran032](#)¹⁰ and [Cran51](#)¹¹. The site survey was undertaken in January 2017, and included survey and assessment of the wider area.

1.46 The report assessed the likely effects of development within different land parcels and provides the evidence base that supports and informs the masterplan.

1.47 **The living conditions of existing residents.**

1.48 The western expansion area is bounded to the north by the railway line and Cranbrook Station, and there are residential properties within the Station Yard and along Railway Terrace. A variety of housing is located along Station Road to the west and to the south is the London Road (former A30) frontage including detached properties. To the

¹⁰ https://eastdevon.gov.uk/media/2272699/hda-00a-cranbrook-landscape-and-visual-appraisal_rev-a.pdf

¹¹ <https://eastdevon.gov.uk/media/2760821/landscape-and-visual-appraisal-of-revised-proposals.pdf>

- east the site is bounded in part by Blue Hayes Lane leading to a number of residential properties.
- 1.49 Consideration has been given to the location and living conditions of existing residents when setting out parameters considered appropriate for residential and mixed used areas and green space within the masterplan. Further consideration would be given at detailed application design stage where the likely effect of the development on residential amenity of neighbours is an important consideration.
- 1.50 **An appropriate buffer to properties at Broadclyst Station.**
- 1.51 Broadclyst Station has been considered and, as a result, is also recognised as a separate area in the Cranbrook Plan. In addition to defining a built up area boundary for Cranbrook, a separate boundary is defined for Broadclyst Station.
- 1.52 On the western side of the expansion allocation the Cranbrook Plan masterplan illustrates parameters considered suitable for green space, and includes allotments, play area and surface water attenuation, and provides a green separation from Broadclyst Station to the west.
- 1.53 The current application for Bluehayes 19/0620/MRES puts forward a separate set of parameters and redline area which continues to maintain separation, however the proposals submitted remain subject to ongoing discussions with the LPA.
- 1.54 It remains of note that there is an extant allocation for housing in this area that does not require a buffer to be provided.

1.55	Is the mixed-use allocation at Bluehayes appropriate? What is the rationale for mixed use development?	Q51 – Rationale for Mixed Use Development
1.56	We believe the mixed-use allocation at Bluehayes to be appropriate.	
1.57	The Cranbrook DPD is structured to present a coherent development plan within which policies are designed to deliver the strategic objectives for Cranbrook (pages 3-14 of the DPD), and the requirements for Cranbrook as expressed in Strategy 12 of the East Devon Local Plan 2013 – 2031.	
1.58	Policy CB1, Health and Wellbeing at Cranbrook, is the lead policy within the Cranbrook DPD setting out the overarching policy requirements that the remaining policies are designed to deliver. This policy, as with all policies within the document, sits under the strategic objectives for the document, which the policies are collectively charged to deliver. In particular Policy CB1 requires that ‘...development proposals must: 02 Ensure the community has, and is able to have, the infrastructure to support their needs and aspirations both now and into the future;	
1.59	The Bluehayes development area has an area of mixed-use development indicated to enable the area to meet Policy CB1 and the strategic objectives of the document. Bluehayes is not well connected to the rest of Cranbrook due to topography, where access is reduced to Treasbeare as the southern side of the London Road at this point is an embankment, and current land ownership issues reducing access to the east towards the existing Phase 1 of Cranbrook. This reduced connectivity, especially on foot to community facilities or other non-residential development could result	

<p>in the Bluehayes area having a reduced sense of identity and community, with knock-on effects for the wellbeing of residents.</p> <p>1.60 To address the risk outlined above, the mixed-use area allows non-residential uses to come forward in a way that allows the community living and working at Cranbrook to define and provide for their own needs and aspirations. A full neighbourhood centre at this location is not deemed to be viable for delivery through standard commercial development as Bluehayes does not have the population number or level of passing trade to support such a cluster of uses. However, by enabling these uses to come forward gradually, either through the use of conversion of properties, or through development in the future of properties that deliver uses defined by the community, facilities can come forward that address the long-term needs and aspirations of the community and enabling a character to develop within this area.</p>	
<p>1.61 Has full consideration been given to the impact of this development on the residents at Broadclyst Station?</p> <p>1.62 It remains that the majority of the proposed Bluehayes western expansion area is an existing allocation in the East Devon Local Plan 2013-2031, adopted on 28th January 2016. Some relatively minor additions to the existing allocation boundaries are proposed but have a minimal impact upon the residents of Broadclyst Station due to their size and location when assessed alongside the scale and location of the existing allocation.</p> <p>1.63 The Bluehayes expansion area will comprise a mix of housing, community and commercial uses that will provide a key route throughout the town linking the Cranbrook railway station with the</p>	<p>Q52 – Consideration of residents at Broadclyst Station</p>

	<p>Treasbeare expansion area, Skypark, Exeter Airport and existing development at Broadclyst Station.</p>	
1.64	<p>Recognising the desire of residents of Broadclyst Station for the hamlet to be acknowledged individually and not to sit within the Cranbrook boundary, the inclusion of Broadclyst Station within its own boundary was considered. Whilst in isolation this hamlet of residential and commercial properties does not demonstrate the necessary services and facilities to merit a boundary of its own, following the development of the Bluehayes expansion area the hamlet will lie immediately adjacent to Cranbrook and therefore inclusion within a built-up area boundary is considered appropriate.</p>	
1.65	<p>Consideration has been given to the impact of this development on residents. The Cranbrook Plan recognises that the Bluehayes expansion area is relatively unconstrained but the relationship with existing developments at Broadclyst Station and on Station Road need to be carefully considered.</p>	
1.66	<p>Consideration has been given to the location and living conditions of existing residents when setting out parameters considered appropriate for residential and mixed used areas and green space within the Cranbrook plan masterplan. Further consideration of the likely effect of the development on residents and properties within Broadclyst Station would be given at detailed application design stage.</p>	
1.67	<p>How has the presence of the existing small holding been reflected in the allocation?</p>	<p>Q53 – Presence of small holding</p>

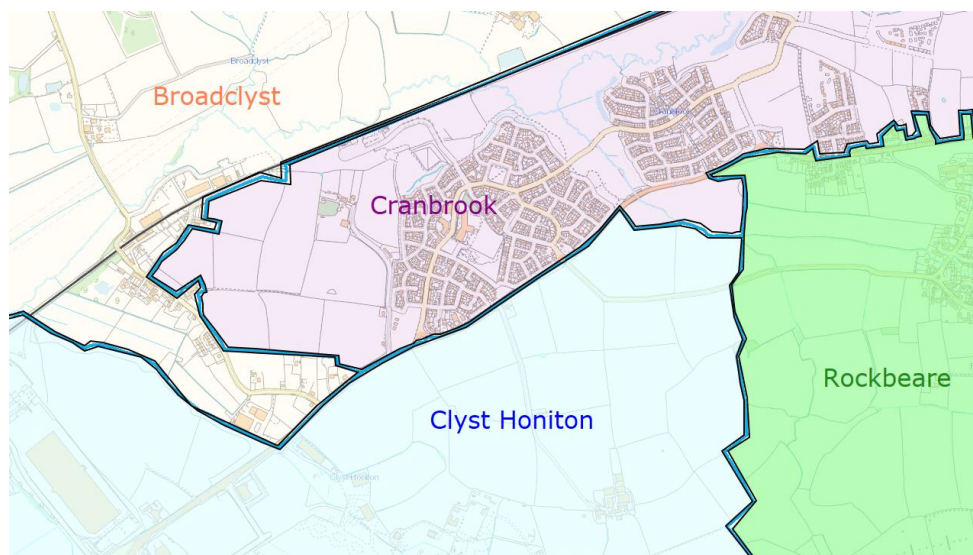
1.68	<p>The existence of a small holding at Railway Terrace has not been examined as part of the allocation. The property and land area is approximately 0.53 acres. This area of land would accommodate a small amount of livestock.</p>	
1.69	<p>The masterplan remains a guide for development and demonstrates the principles that need to be employed across the allocation. In relation to the smallholding, land to the south is indicated on the masterplan as an area of open space with a highway to the east. The allocation is not considered to be a constraint to the use of the land for keeping animals.</p>	
1.70	<p>The current masterplan sets out parameters considered appropriate for development. It is considered that the likely effect on existing and proposed neighbouring properties could be further examined at detailed application design stage where any impacts on or from the registered small holding could be examined in more detail and the resulting development designed appropriately to address issues raised.</p>	
1.71	<p>How will the allocation secure the identity of Broadclyst Station as a separate community?</p>	<p>Q54 – Identity of Broadclyst Station as separate community</p>
1.72	<p>Broadclyst Station has been recognised as a separate area. In addition to defining a built up area boundary for Cranbrook, a separate boundary is defined for Broadclyst Station. In isolation this hamlet of residential and commercial properties does not demonstrate the necessary services and facilities to merit a boundary of its own,</p>	

being built up in a linear fashion around the relatively busy Station Road. Following the development of the Bluehayes expansion area the hamlet will lie immediately adjacent to Cranbrook and therefore inclusion within a built-up area boundary is considered appropriate. It is also considered that this preserves Broadclyst Station’s individuality adjacent to an existing housing allocation.

1.73 **Do the provisions of the allocation accord with the Rockbeare Neighbourhood Plan?**

1.74 In respect of the Bluehayes allocation there is no encroachment into the Rockbeare Parish and therefore the Bluehayes allocation is not within the neighbourhood plan area.

1.75 This is shown in the map extract set out below which highlights the four Parish areas and their respective boundaries.



**Q55 –
Relationship to
the Rockbeare
Neighbourhood
Plan**

1.76	What is the purpose of a Comprehensive Development Scheme in relation to this allocation?	Q56 – Purpose of Comprehensive Development Scheme
1.77	The Comprehensive Development Scheme (CDS) is a mechanism whereby all minimum use and infrastructure requirements identified within the policy can be found a “home” (location), and delivered in full whilst recognising existing Green infrastructure and the options for enhancement.	
1.78	Within a number of responses that have been received it is noted that concerns regarding the implication of CDSs have been raised – most particularly the perception that these would otherwise require agreement between two or more land owners or developers. The CDS has the benefit of ensuring that all uses, infrastructure and requirements are addressed and that none are left to the last developer to bring forward.	
1.79	The Policy requirement for the CDS does not set that there is a need for agreement between developers and as result it is possible for a developer to submit a CDS for the allocation without regard to other land owners. If this occurred then the Council would be able to consult with other relevant land owners and take a view on whether the plan demonstrates a suitable distribution. However it is also important to note that three of the expansion areas are, in a large part under the control of a single developer/owner - only Grange does not enjoy such a majority owner.	
1.80	To ease the requirement where there is a majority land owner it would be possible to build into the policy a threshold which effectively allows developers, where they hold a significant controlling majority, to	

<p>entirely manage their own CDS. If this threshold was set at 80% it would facilitate the delivery at Bluehayes, Treasbeare and Cobdens where the majority control all lie above this percentage. For such areas it is nonetheless less still appropriate to retain a requirement for a CDS, as land ownership and control can change or become fragmented over time.</p> <p>1.81 If this modification is made to Policy it would have to recognise that where there is a large majority control, there is an expectation for the majority developer to be responsible for delivering all infrastructure that is already identified on their land through the masterplan (linked by Policy CB16), as well as all the remaining non-geographically identified infrastructure set out within the allocations policy.</p>	
<p>1.82 1. Policy CB2 amend paragraph 2 to read:</p> <p>1.83 Unless there is sole control of at least 80% of the allocation area by a lead developer/land owner, a A comprehensive Development Scheme addressing the Bluehayes expansion area in its entirety and recognising and where possible enhancing existing biodiversity assets and green infrastructure shall set out provision for all of the following uses, requirements and infrastructure.</p> <p>1.84 For allocations where there is such a lead developer, the Comprehensive Development Scheme need only address the land holding under the control of the lead developer, but as a result is expected to identify and deliver all uses, requirements and infrastructure listed below except where these are, either in part or in full, specifically located elsewhere within the</p>	<p>AQ7 – Main modifications</p>

Masterplan set out for this allocation shown (collectively at Figure 8).

1.85 The scheme shall be agreed in writing by the Local Planning Authority before any planning application for development **in the CDS area** of ~~all or part of the expansion area~~ is determined. Subsequent applications must comply with the approved comprehensive development scheme. Where land is allocated for specific uses on the policies map, the uses will fall on and within the designated areas:

Appendices

There are no appendices with this statement