

Matter 5 - Treasbeare Expansion Area

Issue 8: Is the Treasbeare Allocation (Policy CB3) positively prepared, justified and effective?

Q59. What is the justification for development on land identified as green wedge within Strategy 8 of the adopted Local Plan?

In 2012, Land Use Consultants (LUC) were commissioned to prepare a Sustainability Appraisal (SA) Report to identify potential areas within the District suitable for future development. The report, together with other documents prepared during 2013, 2015 and 2017, referred to below, contributed and informed outcomes in the preparation of the current East Devon Local Plan, and has relevance to options reviewed during the creation of both the Cranbrook Plan and 2019 Sustainability Appraisal documents.

Various draft documents were submitted to EDDC, including an addendum report which specifically addressed impacts of building 1500 homes as part of a Southerly Expansion.

May we draw your attention to objective 8 taken from Page 27 of the [Sustainability Appraisal Report West End Addendum Report](#) (October 2012; Figure 1 in Appendix), which highlights a '**significantly negative**' impact of a Southern Expansion.

Within this objection, LUC draw attention to the adverse effects on Rockbeare Village. They then go on to cite potential impacts on the wider landscape, as the land is on designated Green Wedge. Indeed, they note that consultation feedback stressed the importance attached to this Green Wedge and avoidance of coalescence between Cranbrook and Rockbeare - quote "Development of the site would **significantly impact** on the Green Wedge/settlement separation consideration".

Further, elsewhere in their report, LUC state that expanding South of the A30 is "seen as an undesirable outcome" because it would "**significantly impact** on the gap, currently defined as a Green Wedge that separates Cranbrook from Rockbeare village and as such could ultimately lead to settlement coalescence". See full commentary in Figure 2 of the Appendix, taken from Page 27 of the [Sustainability Appraisal Report West End Addendum Report](#) (October 2012).

This significant negative impact is once again highlighted in LUC's updated SA documents in [2013](#) (Page 28) and [2015](#) (Page 849).

EDDC, whilst not openly accepting that coalescence issues will occur, definitely acknowledge the extreme sensitivity attached to development of the Eastern edge of the

Treasbeare Expansion option, but suggest that landscaping will mitigate and minimise the substantial adverse impact which will result from development of the Green Wedge.

In November 2017, Hankinson Duckett Associates prepared a [Landscape and Visual Appraisal report](#) on behalf of EDDC. A number of references within the report refer to the high sensitivity of the Southern Expansion option - e.g. "The proximity of Rockbeare to Cranbrook and the rural setting of the village results in a **High sensitivity to change** within the immediate setting to the village (including the slopes of the surrounding hills)".

Specifically, land to the east of the local ridgeline, which encompasses the Green Wedge, is described as being "more rural in character with much stronger links to the wider landscape", forming "part of the wider setting to Rockbeare". The high visual sensitivity of the area to the east of the ridgeline is consistently highlighted as well. Please see the photos in Figure 3 to demonstrate these points.

Paragraphs 7.2.13 and 8.2.14 in this report clearly state that none of the land to the east of the ridge is proposed for development because of the sensitive setting to Rockbeare (see Figures 4 and 5 in the Appendix). Development was not foreseen to encroach onto the Green Wedge, and the boundary for development restricted to the western side of Parsons lane. Land to the east of the ridge is earmarked as becoming open space or SANG, constituting "a rural landscape with long and attractive views out to the east, which could be enjoyed by the public."

Later in the report (Paragraph 8.3.8), the benefits of keeping the land east of the ridgeline free from development are emphasised, namely in regard to allowing locals and visitors to appreciate long views over the surrounding landscape to the east (please see Figure 6 in the Appendix).

However, despite the very clear negative impact highlighted by LUC, the guidance offered by Hankinson Duckett Associates, and development proposals which are in contravention of Strategies 3,7,8 and 47 of the Council's Local Plan and Section 11 of the National Planning Policy Framework, EDDC has made a conscious decision for development of the Green Wedge, without any justification.

Indeed, EDDC's [2013-31 Cranbrook Plan](#) presents a view of complete variance to that provided by LUC, stating that development would not result in coalescence or have a demonstrable harmful impact on the landscape (Page 27, Paragraph 3.18 - see Figure 7 in Appendix).

Although methodically assessed at key stages of its production by LUC, the final [2019 Sustainability Appraisal](#), published by EDDC, presents substantially different indicators of SA evaluations to those submitted by LUC, with significant negative impacts and negative impacts reduced to minor negative or questionable outcomes in relation to landscape character and historic environment. The only significant negative impact they note is related to waste. Please see Figure 8 in the Appendix, taken from Page 208 of the 2019 document.

What explanation can EDDC offer in respect of these downgraded SA assessments?

Page 39 of the 2019 Sustainability Appraisal document includes representation by East Devon New Community Partners in which they express concern that the SAs have not taken into account avoidance of development in Green Wedge areas, as seen in Figure 9 in the Appendix.

Why is it that EDDC are so resolute in their intention to minimise, or indeed ignore altogether, the significant negative effects of Treasbeare expansion?

The decision to contradict Strategy 8 of the East Devon Local Plan demonstrates a failure to comply with s 24(1) Planning and Compulsory Purchase Act 2004, which requires that the local plan is prepared in conformity with the regional strategy of the area. This demonstrates how the Plan is not sound.

Q60. Strategy 7 of the East Devon Local Plan rules against development that would cause the adverse disruption of a view from a public place which forms part of the distinctive character of the area or otherwise causes significant visual intrusions. Would the allocation of CB3 result in the loss of open space and lead to settlement coalescence; would it conflict with the EDLP in respect of strategy 7 by proposing development which would impact on the skyline (the ridge)?

LUC's 2012 Sustainability Appraisal Addendum also highlights a negative impact that has seemingly been ignored by EDDC in their development of the Cranbrook Plan. LUC note that the landscape character of the Treasbeare area would be "adversely affected because it would impinge significantly on the Green Wedge and the separation of Cranbrook and Rockbeare" (as seen in Figure 2).

Furthermore, concerns are consistently raised by LUC in reference to the location of the proposed expansion area being "visible from a number of vantage points" (also shown in Figure 2).

In addition, within the draft [Sustainability Appraisal report \(2017\)](#), a "notable negative" is warned of, in respect of landscape character. As explained on Page 93 of this document, "the site occupies an elevated position of some prominence, especially from views from the north". See full commentary in Figure 10 of the Appendix.

Each of the above representations have been identified and reiterated within the 2017 Hankinson Duckett Associates [Landscape & Visual Appraisal report](#), and recommendations made which avoid development of the Green Wedge.

With all this in mind, what justification is there for developing on the assigned Green Wedge when it so clearly conflicts with a number of strategies contained within the East Devon Local Plan?

Q65. Is the siting of a 5 pitch Gypsy and Traveller site at the eastern extent of Treasbeare appropriate?

There is no supporting text or evidence within the DPD to explain the inclusion or rationale of the 5 pitches at the eastern extent of Treasbeare.

The Plan deviates from the East Devon Local Plan

The initial context for provision for Gypsies and Travellers is set out in policy H7 of the [East Devon Local Plan 2013-2031](#) (P.192; see Figure 11). What immediately stands out when examining H7 is the criteria referring to a site's impact on the visual landscape.

According to H7, planning permission will be granted if a site has "no significant adverse impact on the appearance or character of the landscape". In the case of the proposed site within Treasbeare, there is a clear conflict between this section of H7 and the Cranbrook DPD which aspires to have "an attractive and welcoming entrance to the town at its eastern edge", with London Road becoming its "shopfront".

Further, H12 in the East Devon Local Plan 2006-2026, states that planning permission for a permanent or transit site will not be granted if it is situated "within an Area of Outstanding Natural Beauty, Green Wedge or on a site designated as being of conservation interest". Curiously, this point has been removed in the 2013-2031 East Devon Local Plan.

Issues with the SA

For the purposes of the SA, areas B1, B3 and the South West corner of T form parts of the Green Wedge. On Page 223 of the [2019 Sustainability Appraisal](#), B1 and B3 are both given a negative impact assessment for landscape character. As B3 and the SW corner of T are adjacent areas, forming part of the Green Wedge, it seems unreasonable not to allocate them the same impact level (see Figure 12, where area T is given an uncertain negative impact assessment). Had area T been given the same impact level, it would surely become clear that this is not an appropriate site for the 5 gypsy and traveller pitches.

It is also stated in the 2019 Sustainability Appraisal that taller buildings would be visually prominent, and that single storey homes would not. We would argue that due to the topography of site T (sloping towards the current development and the popular country park), any structure located in the south west corner would be visually prominent. Please see Figures 13, 14 and 15 in the Appendix).

It's significant to note that in previous draft SAs, there is no reference to the impact assessment of area T, as it was seen as "having an open space use", as part of the Cranbrook Country Park (please see Figure 16). What was the justification for this change in use?

With all this in mind, one struggles to see how the siting of 5 pitches at the Eastern extent of Treasbeare is appropriate, or indeed sound.

Q67. Has full consideration been given to the impact of this development on air quality and its' proximity to the airport?

In terms of air quality, there will undoubtedly be a huge impact to current residents during the construction phase of the Treasbeare development.

Just one of the factors at play is the developers' projection that 100,000 tons of soil will need to be moved during earthwork activities, resulting in significant dust emissions (figure taken from an [Environmental Statement](#) produced by Brookbanks Consulting Limited; see Figure 17 in Appendix). Furthermore, construction and trackout activities are also predicted to cause large dust emission levels (Figures 18 and 19 in Appendix). Have EDDC considered how the addition of fine particles to the air will negatively affect existing residents?

As consistently stated in LUC's Sustainability documents since 2012, there is likely to be a **significant adverse noise impact** on new residents in the Treasbeare expansion area due to its close proximity to Exeter airport (see Figure 20, taken from Page 31 of the [Sustainability Appraisal Addendum](#) of 2013). This impact will only be amplified for the residents of the proposed gypsy and traveller site, whose sound insulation will be less effective than those living in bricks-and-mortar homes. Would there not be a more appropriate location for this site?

Appendix

Figure 1

Cranbrook – Site W123 – Southerly Expansion Option: SA Objective 8.

Taken from Page 27 of the [Sustainability Appraisal Report West End Addendum Report](#) (October 2012).

| | | |
|--|-----|--|
| 8: To maintain and enhance built and historic assets | --? | There are very few historic features at/within the Cranbrook however the old A30 on the northern boundary of the site forms part of the Fosse Way roman road. Rockbeare village lies close to this site option and the village has number historic buildings that are close to the site and whose setting could be adversely affected . There will be potential for impacts on the wider landscape for this option and it would sit on land that is designated as a Green Wedge under existing and emerging plan policy. Consultation feedback stressed importance attached to this Green Wedge and avoidance of coalescence between Cranbrook and Rockbeare. Development of the site would significantly impact on the Green Wedge/settlement separation consideration. |
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Figure 2

Cranbrook – Site W123 – Southerly Expansion Option: SA Objective 9.

Taken from Page 27 of the [Sustainability Appraisal Report West End Addendum Report](#) (October 2012).

| | | |
|--|---|---|
| 9: To promote the conservation and wise use of land and protect and enhance the landscape character of | - | The site is away from protected landscapes (notably AONBs and the coast) but visible form a number of vantage points. The site is very large and on greenfield land which means that there will be negative effect in relation to the wise use of land. The landscape character would be adversely affected because it would impinge significantly on the Green Wedge and the separation of Cranbrook and Rockbeare. |
|--|---|---|

| SA Objective | SA Score | Justification and Commentary - Cranbrook – Site W123 – Southerly Expansion Option |
|--------------|----------|---|
| East Devon | | |

Figure 3

Existing view west of Rockbeare from Parsons Lane towards Treasbeare and Cranbrook Phase 1.

Taken from [Cranbrook Masterplan 2019](#).



Existing view from the local ridgeline looking towards Rockbeare.



Figure 4

Landscape Mitigation in the Southern parcel (Treasbeare).

Taken from Paragraph 7.2.13 of the [Landscape and Visual Appraisal report](#) produced by Hankinson Duckett Associates on behalf of EDDC (November 2017).

7.2.13 Within the southern parcel, the proposed development would be contained to the west of the local ridgeline. The edge to development is currently demarcated by a hedgerow, which would be subject to additional tree planting, to further screen the proposals from views to the east. This strategy would maintain the setting to Rockbeare and the sense of separation currently enjoyed between Rockbeare and Cranbrook. The land to the east of the proposed development would become open space or SANG and constitutes a rural landscape with long and attractive views out to the east, which could be enjoyed by the public. New characteristic landscape features could be introduced, including hedgerow trees, species rich grassland, parkland / wood pasture and woodland copses, which would increase biodiversity within the parcel and would provide additional screening to the proposed development. Key features and primary corridors within the proposed development area have been proposed for retention.

Figure 5

Landscape Appraisal of the Southern parcel (Treasbeare).

Taken from Paragraph 8.2.14 of the [Landscape and Visual Appraisal report](#) produced by Hankinson Duckett Associates on behalf of EDDC (November 2017).

Southern Parcel (Treasbeare)

8.2.14 A large portion (approximately two thirds) of the parcel is not proposed for development within the masterplan, due to noise constraints and the sensitive setting to Rockbeare to the east of the local ridge. None of the land to the east of the local ridge is proposed for development. Housing and business uses are concentrated to the north-west of the parcel. The majority of existing features would be retained and protected through the course of the development, although there would be some hedgerow loss. A number of the agricultural fields would see a change in land use and character. The below table summarises the predicted changes and effects of the proposals on the character of the parcel and key features.

Figure 6

Residual Effects in the Southern parcel (Treasbeare).

Taken from Paragraph 8.3.8 of the [Landscape and Visual Appraisal report](#) produced by Hankinson Duckett Associates on behalf of EDDC (November 2017).

Southern Parcel (Treasbeare)

8.3.8 10 years after completion, the character of the new housing development would have established. The public open space and potential SANG would be in public use and new features including SuDS basin wetland areas, would have been created. The proposed pitches and open space would provide improved recreational facilities for local residents. Street trees and garden planting would have matured, which would add to the character of the street scene. Within the open space and potential SANG, to the east of the parcel, there is the opportunity for significant landscape improvements in the form of new characteristic landscape features and improved recreational access. This could include new hedgerows, tree belts and woodland blocks, which would improve the landscape to the south and east of the parcel. The retention of high ground within public open space adjacent to the proposed pitches would **allow locals and visitors to appreciate long views over the surrounding landscape to the east**, which are currently unavailable to the public. The overall residual effects on the landscape character of the parcel would be **Moderate beneficial**. The below table summarises the predicted changes and effects of the proposals on the character of the parcel and key features.

Figure 7

Section 3.18, 2013-31 Cranbrook Plan.

Taken from Page 27, Paragraph 3.18 of the [2013-31 Cranbrook Plan](#).

3.18 The Treasbeare expansion area has a number of constraints that need to be carefully considered in the bringing forward of land for development. A local ridgeline marks the eastern extent of the Treasbeare expansion area with the land falling generally to the west and south, with localised undulations. To the east of the ridgeline the land falls sharply, with the village of Rockbeare located further east. Land north of Parson's Lane and south of London Road is presently identified as green wedge by Strategy 8 of the East Devon Local Plan 2013-2031. Much work has been undertaken to look at the landscape and visual impacts of the development of Cranbrook to the south of London Road, both east and west of Rockbeare. In respect of development parcels shown as part of the Treasbeare expansion area, development in the westernmost field identified as green wedge in Strategy 8 is not considered to have a demonstrably harmful impact upon the landscape or visual receptors and will not lead to a perception of settlement coalescence.

Figure 8

Appraisal of site B1.

Taken from page 208, [Sustainability Appraisal of the Cranbrook Plan - Publication Draft document](#) (February 2019).

| SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location | 1 Housing | 2 Community services | 3 Education and skills | 4 Health | 5 Crime | 6 Noise | 7 Leisure and recreation | 8 Historic environment | 9 Landscape character | 10 Amenities | 11 Biodiversity | 12 Sustainable transport | 13 Air, soil and water | 14 Greenhouse gas emissions | 15 Flood risk | 16 Energy efficiency | 17 Waste | 18 Employment | 19 Town Vitality & viability | 20 Inward investment |
|--|-----------|----------------------|------------------------|----------|---------|---------|--------------------------|------------------------|-----------------------|--------------|-----------------|--------------------------|------------------------|-----------------------------|---------------|----------------------|----------|---------------|------------------------------|----------------------|
| Site B1 only | ++ | ++ | ++ | ++ | 0 | -? | + | -? | - | 0 | 0 | ++ | - | ++ | 0 | 0 | - | + | + | + |
| <p>Area B1 has been defined to exclude land to the south (area B2 - see above) a large part of which falls above the 55 db World Health Organisation noise threshold. By excluding areas above 55 db level the health impacts, SA Objective 6, are reduced to (just) a negative impact. This also results in objectives 1 - opportunities to live in a decent house now achieving a significant positive scoring.</p> <p>Appraisal of B1 shows that it performs well in sustainability terms. The area is substantial in scale and therefore it offers scope to accommodate a wide range of services and facilities that can be supplied in an integrated manner alongside substantial levels of housing as part of a comprehensive development scheme. Proximity to the first phase of development at Cranbrook will ensure good access to existing services and facilities and being on the western edges of Cranbrook it is closer to major employment centres than others sites with benefits including reduced journey lengths to work. Given proximity to facilities the site scores significant positive benefits against SA objectives 1 – Housing, 2 - Community services, 3 - Education and skills, 4 – Health, 12 - Sustainable Transport and 14 - Greenhouse gas emissions. The latter two are informed by, amongst other matters, physical proximity to the railway station and existing public transport. Positive benefits are noted in respect of a number of SA objectives: - 7 - Leisure and recreation, 18 – Employment, 19 - town vitality and viability and 20 - inward investment on account of existing facilities, including employment sites west of Cranbrook, and policy CB3 requiring provision.</p> <p>A significant adverse impact is identified against SA objective 17 as being a large site, in construction and operation (primarily people living in house), large levels of waste generation may be expected. In a number of cases negative impacts compared to SA objectives are identified for this site; this includes in terms of avoiding adverse landscape impacts – SA objective 9. In landscape terms the site avoids extending over ridgelines where development could be of visual prominence though being a large site some adverse impacts could be expected. The site is relatively close to Exeter Airport and noise impacts are therefore a matter of possible concern, SA objective 6 - noise sees a negative SA impact. Mitigation measures would be likely to be needed to address adverse impacts and some SA scores (notably for housing) are based on assumption that mitigation and sound insulation measures, if or where needed, would be incorporated. There are few historic assets, SA Objective 8, on or immediately around the site though negative impacts could be possible as would impacts on SA Objective 13 – air, soil and water.</p> <p>Site B1 form the bulk of the Cranbrook plan Treasbears expansion area as allocated under Policy CB3 of the plan.</p> | | | | | | | | | | | | | | | | | | | | |

Figure 9

Summary of consultation feedback on the SA of the Issues and Options report.

Taken from Page 39 of the [Sustainability Appraisal of the Cranbrook Plan - Publication Draft document](#) (February 2019).

| | |
|---|--|
| David Lock Associates for East Devon New Community Partners (EDNCp) | <p><u>Green Wedges</u></p> <p>At paragraph 7.56 of their submission the EDNCp express concern that the SA work has not taken into account avoidance of development in Green Wedge areas.</p> |
|---|--|

Figure 10

Appraisal of Site B3.

Taken from Page 93 of the [2017 draft Sustainability Appraisal](#).

| Sites B3 | + | + | + | + | 0 | 0 | + | 0 | - | 0 | 0 | + | 0 | + | 0 | 0 | 0 | 0 | + | 0 | 0 |
|--|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| <p>This small site is proposed for development by the New Community partners in application 15/0046/MOUT it is, however, not identified for development in the Masterplan. The site generally scores well when measured against the sustainability objectives. The notable negative is, however, in respect of landscape character. The site occupies an elevated position of some prominence, especially from views from the north.</p> | | | | | | | | | | | | | | | | | | | | | |

Figure 11

Policy H7.

Taken from 192 of the [East Devon Local Plan 2013-2031](#).

H7 - Sites for Gypsies and Travellers

In the period up to 2034, 37 gypsy and traveller pitches and 3 plots for travelling showpeople should be provided. During the first 5 years, from 2014-2019, at least 22 of the gypsy and traveller pitches should be provided and 1 of the travelling showpeople's plots (with this to be accommodated on an existing permitted site with spare capacity at Clyst St Mary).

Planning permission for a permanent or transit sites for gypsies and travellers will be granted if the proposal satisfies all of the following requirements:

1. It has a satisfactory relationship with other neighbouring land uses.
2. It has acceptable vehicular access and provision for on-site turning, parking and servicing.
4. It contains satisfactory proposals for screening and landscaping.
5. It has no significant adverse impact on the appearance or character of the landscape or amenity of occupiers of neighbouring properties and any impacts will be mitigated to an acceptable level.
6. In respect of proposals Outside Built-up Area Boundaries The local East Devon need has been proven and cannot be met elsewhere in the District.
7. Where sites already exist within the locality, new pitches should be accommodated through expansion/ increased use of these existing sites though as smaller sites can be more acceptable, site size restrictions could be applicable to ensure sites do not become too large. Where it is not possible to expand/intensify existing sites, the cumulative impacts of additional sites, particularly on the character of the local area and existing community, will be taken into account in addition to other considerations.

Permanent sites should be conveniently located for access to existing community services and facilities and within 30 minutes travel time by public transport, walking or cycling of a primary

Figure 12

SA impact assessment of site T.

Taken from Page 223 of the [2019 Sustainability Appraisal](#).

| | | | | | | | | | | | | | | | | | | | | |
|---|-----------|----------------------|------------------------|----------|---------|---------|--------------------------|------------------------|-----------------------|------------|-----------------|--------------------------|------------------------|-----------------------------|---------------|----------------------|----------|---------------|------------------------------|----------------------|
| SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location | 1 Housing | 2 Community services | 3 Education and skills | 4 Health | 5 Crime | 6 Noise | 7 Leisure and recreation | 8 Historic environment | 9 Landscape character | 10 Amenity | 11 Biodiversity | 12 Sustainable transport | 13 Air, soil and water | 14 Greenhouse gas emissions | 15 Flood risk | 16 Energy efficiency | 17 Waste | 18 Employment | 19 Town Vitality & viability | 20 Inward investment |
|---|-----------|----------------------|------------------------|----------|---------|---------|--------------------------|------------------------|-----------------------|------------|-----------------|--------------------------|------------------------|-----------------------------|---------------|----------------------|----------|---------------|------------------------------|----------------------|

| | | | | | | | | | | | | | | | | | | | | | |
|--|---|---|---|---|---|---|---|---|---|----|---|---|---|---|---|---|---|---|---|---|---|
| Site T – South west corner only | + | + | + | + | 0 | 0 | 0 | 0 | 0 | -? | 0 | 0 | + | 0 | + | 0 | 0 | - | 0 | 0 | 0 |
| <p>The south west corner of site T is appraised separately from the remainder of Site T as part of this area is proposed for a gypsy and traveller site. It is a small site in close proximity to many of the existing facilities of Cranbrook and close to the town centre, albeit lies south of London Road. Proximity to planned and existing facilities plays to the favour of the site and helps account for positive scores against a number of the SA objectives, specifically 1- housing, 2, community services, 3 – education and skills, 4 – health, 7 – leisure and recreation, 12 sustainable transport and 14 – greenhouse gas emissions (with the last two informed by proximity and ease of access to public transport).</p> <p>There is possible potential however for negative effects, albeit with uncertainty noted, on landscape character – SA objective 9. The site falls in a local plan Green Wedge area and taller buildings on the site may be of some visual prominence. Though caravans, being significantly less high than two or three storey houses, would be much less prominent than 'bricks and mortar' housing. Planting and landscaping of the site could also provide mitigation from adverse impacts.</p> <p>The south west corner of site T is allocated on the Cranbrook Plan Policies Map for a gypsy and traveller site.</p> | | | | | | | | | | | | | | | | | | | | | |

Figure 13

Photo of Green Wedge area taken from Cranbrook Country Park.

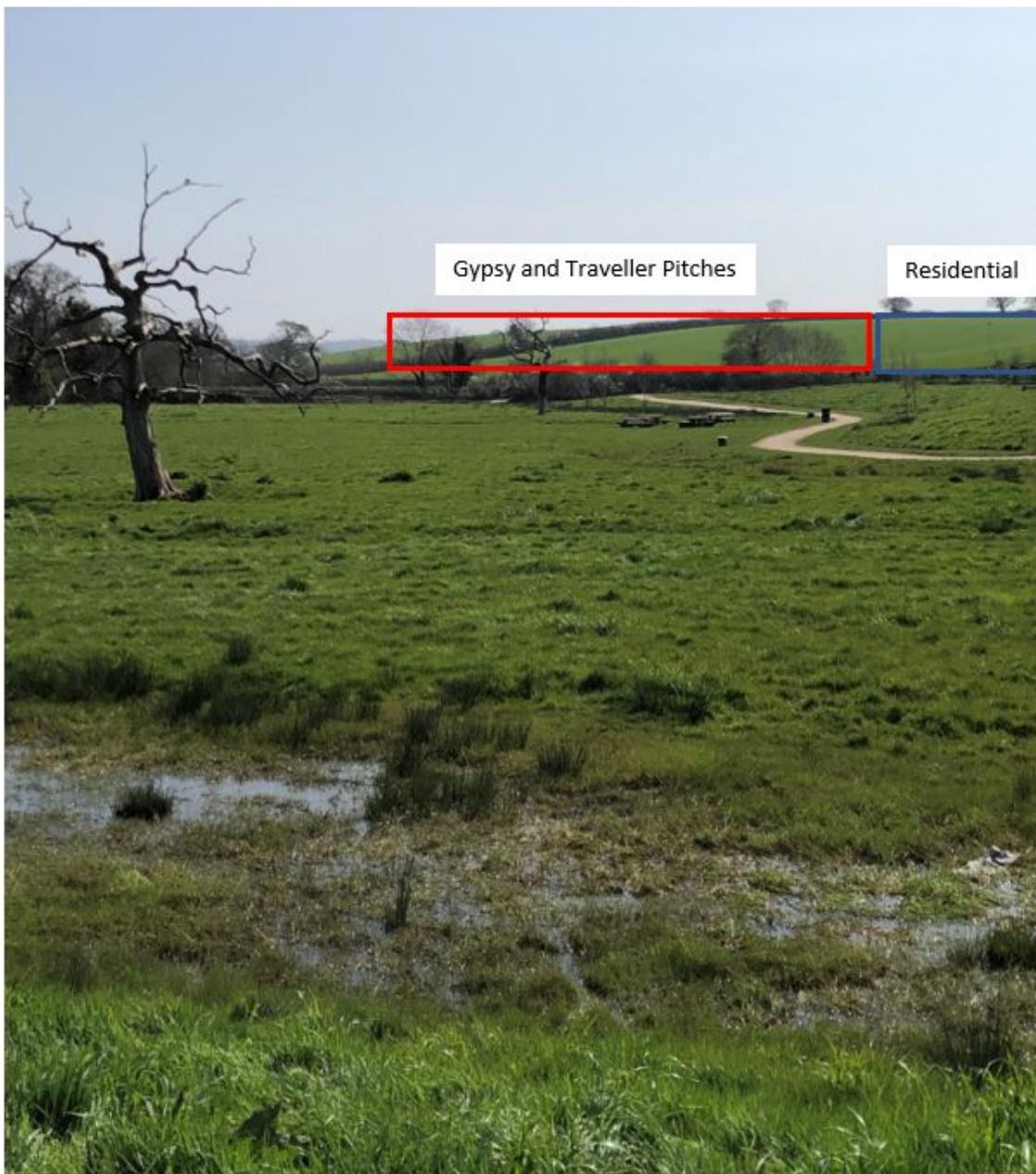


Figure 14

Photo of Green Wedge area taken from Post Coach Way.



Figure 15

Photo of Green Wedge area taken from the junction between Tremlett Meadow and Crab Apple.



Figure 16

Description of Site T.

Taken from the [2017 draft Sustainability Appraisal](#), Page 101.

Sites R, S and T

A formal appraisal of sites R, S and T has not been undertaken as these sites have not been proposed for development by landowners and they are not proposed for development in the masterplan. To provide an overview of land on this southern side of Cranbrook a succinct summary comment is however provided.

Site R - is in the same ownership/control as the promoter of Site O, P and Q. Site R is indicatively show in issues and options submissions as open space (as is land to the south of O, P and Q). Site R itself is visually prominent from Rockbeare and other points.

Site S - has not been promoted for development but is visually prominent.

Site T - this site falls in EDNCp control but it has not been promoted by them for built development, rather it is seen as having an open space use and part is in the Cranbrook Country Park.

Figure 17

Large dust emissions from earthwork activities.

Taken from Page 20 of Chapter 6 of the [Environmental Statement](#) produced by Brookbanks Consulting Limited, June 2017 (included in planning application 17/1482/MOUT ref. 2748337).

6.5.9 The Southern Expansion area is approximately 80ha in size. Application B is approximately 7.5 hectares in size. Given the size of the Sites it is anticipated that during earthwork activities there would be more than 10 earth moving vehicles active at any given time, there is also the potential for material to be stored in bunds of more than 8 m in height and the amount of material to be excavated and move could be more than 100,000 tonnes. The Site is therefore considered to have a **dust emission class of 'large' with regards to earthwork activities.**

Figure 18

Large dust emissions from construction activities.

Taken from Page 20 of Chapter 6 of the [Environmental Statement](#) produced by Brookbanks Consulting Limited, June 2017 (included in planning application 17/1482/MOUT ref. 2748337).

6.5.11 Given the size of the Site and proposed development of residential, educational, employment, commercial and community uses total building volume is anticipated to be more than 100,000 m³ in volume and the main construction materials would be concrete and brick, potentially dusty materials. The Site is therefore considered to have a **dust emission class of 'large'** with regards to construction activities.

Figure 19

Large dust emissions from trackout activities.

Taken from Page 21 of Chapter 6 of the [Environmental Statement](#) produced by Brookbanks Consulting Limited, June 2017 (included in planning application 17/1482/MOUT ref. 2748337).

6.5.13 Given the size of the development area it is expected that there would be around 50 Heavy Duty Vehicles (HDV) accessing the Site on a daily basis albeit that it would be in excess of this if the southern expansion site were development at the same time as the western and eastern Local Plan commitments, and construction vehicles would be travelling across the sites on unpaved haul roads. **The Site is therefore classed as 'large' with regards to trackout activities.**

Figure 20

Noise impact assessment.

Taken from Page 31 of the [Sustainability Appraisal Addendum](#) of 2013.

| | | |
|---|--|---|
| 6: To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution | | The southern expansion site would be adjacent to the dwellings that form part of the main Cranbrook development and the existing settlement of Rockbeare to the south, which may be affected by noise from development at the site. In addition, the site lies closer to Exeter Airport (approximately 1.5km to the south west) than other parts of Cranbrook. The airport could have some adverse noise impacts on residents of new properties. As such, a significant negative effect on this objective may occur. However, effects relating to noise are currently uncertain as the impacts will depend on factors such as hours of site operation during the construction phase, and it is expected that site operators would limit the potential nuisance of construction activities by employing good practice construction techniques. Overall site management and detailed design considerations will be key to minimising noise impacts. |
|---|--|---|