

Statement for the examination of the Cranbrook DPD

Response to the Inspectors Matters Issues and
Questions

Matter 7: Grange Expansion Area

Date – 8 January 2020

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Issue 10: Is the Grange Allocation (Policy CB5) 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: a) confirmed by the landowner involved as being available for the use proposed? b) supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided? c) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?</p>	<p>Q106 – Deliverability of allocation with regard to land ownership, access and constraints</p>
<p>1.2 The housing allocation comprising Grange is under the control of four parties comprising – Baker Estates (as developer) Stuarts (as developer/promoter); Mr Mingo (as land owner) and the Woodland Trust (as land owner). With the exception of Mr Mingo, both Baker Estates and the Stuarts have been actively engaged with the Council in seeking to bring forward their sites attending various meetings and workshops, and in the case of the Stuarts submitting a recent planning application for development of their part of the allocation (referenced in PSD2). While Mr Mingo has not sought to be so actively involved he has written to the Council at the preferred approach stage of plan preparation to confirm that his land is available for development. Correspondence from Mr Mingo is set out at appendix 1 to this statement. Taken as a whole it is considered reasonable that the housing trajectory considered within</p>	

the viability evidence proposed for development at Grange and which suggests first completions in 2022, is not unreasonable.

- 1.3 The Woodland Trust do not own potential development land but do control land that is suitable for use as SANGS and there have been a number of meetings with Council Officials to take this forward – including the preparation of a Statement of Common Ground confirming that both blocks of woodland within their control can in principle be used as SANGS, exceeding the area that the Council initially advocated.
- 1.4 In terms of access, considerations for this allocation are very similar to those for the Cobdens allocation. While the single application that has so far been submitted is much earlier in consideration, the important principles remain the same – that is to provide safe pedestrian crossings and vehicle accesses from the main road, which while at grade with surrounding land currently facilitates fast movement along a straight section of road. As with Cobdens there is no suggestion that such access/crossing provision cannot be provided although designs have yet to be worked up. In addition the diversion of the north section of Gribble lane is suggested through the Masterplan to facilitate the movement of vehicles through the site, allowing a better designed and safer junction and avoiding impact on the avenue of protected trees that line that section of the Lane.
- 1.5 Delivery of development at Grange has a number of constraints focussing on such aspects:
- overhead powers lines that cross the site
 - streams and ditches that cross the area and are primarily classified as Flood zone 2 by the Environment Agency
 - Woodland blocks to the south of the allocation and which are owned by the Woodland Trust
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	<ul style="list-style-type: none"> • Mature parkland trees on the Stuarts land (forming the allocation to the west of Gribble Lane) <p>1.6 Evidence set out in the following documents demonstrates that with careful layout and phasing of development these can be overcome so that they do not present an insurmountable constraint to development</p> <p>1.7 Cran017 https://eastdevon.gov.uk/media/2763279/18110001601_Flood-Risk-Review-and-SW-Drainage-Strategy_B0_12-Feb-2019.pdf</p> <p>Cran031 https://eastdevon.gov.uk/media/2760815/Overhead-lines-Strategy-Report-October-2018.pdf</p> <p>Cran051 https://eastdevon.gov.uk/media/2760821/Landscape-and-Visual-Appraisal-of-Revised-Proposals.pdf</p> <p>Cran052 https://eastdevon.gov.uk/media/2780127/Cranbrook-Masterplan-2019.pdf</p> <p>1.8 Other environmental considerations have been addressed through the plan, policy and in developing the masterplan such that development on the Cobdens site is deliverable.</p>	
<p>1.9</p>	<p>Has full consideration been given to the impact of this allocation on:</p> <ul style="list-style-type: none"> a) Access arrangements b) Landscape impact c) Flood risk management and water quality d) Ecology and the impact on natural habitats 	<p>Q107 – Consideration in respect of access, landscape, flood risk and ecology</p>

1.10 Access

- 1.11 Access to the allocation is good with a number of access points expected to be achieved with the majority from the London Road but others also recognising Gribble Lane from the South and east west linkages across that Lane connecting land either side. There is currently no suggestion that the site cannot be accessed safely and efficiently reflecting the broad aims of the masterplan ([Cran051](#)¹) and the original movement strategy (Cran026) and its addendum ([Cran065](#)²)

Landscape

- 1.12 In terms of landscape impact care has been given to the southern extent of the built form recognising the landscape evidence that underpins the allocation and which is referenced in evidence documents particularly Cran051 but also having regard to Cran032; 043; 046; 047 (collectively found on the Council's [examination](#)³ website). It has been in giving full regard to this evidence that the built up area boundary for development has been located to the south and therefore away from the top of the escarpment which drops down towards the village of Rockbeare and importantly the Grade I Rockbeare Manor and its associated Historic Parkland (separately recognised as a heritage asset and registered Grade II)

- 1.3 The western extent of this allocation picks up the strong boundary formed by the driveway to the Grange Hotel while the eastern extent which lies on very gently sloping land is otherwise less sensitive is marked by a retained hedgerow.

¹ <https://eastdevon.gov.uk/media/2780127/cranbrook-masterplan-2019.pdf>

² https://eastdevon.gov.uk/media/3264903/cran065-190801_transport-and-movement-addendum.pdf

³ <https://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-consultation-responses-and-submission/#article-content>

1.4 Flood Risk and Water Quality

1.5 Flood risk for the Grange allocation is confined to primarily two narrow stream corridors – one running north south along Gribble Lane and the other which sits on a northwest–southeast axis through the centre of the site. Neither are considered to result in a significant constraint to development and can be accommodate within the suitable layout.

1.6 Surface water runoff is expected to be managed through above ground sustainable drainage systems having regard to future infiltration and percolation tests and the surface water management hierarchy. Cranbrook phase 1 has demonstrated that much of the site is impermeable but this has not prevented adequate source control measures being employed. Recognising that increased best practice now exists which further demonstrates how surface water can be effectively managed in such environments, it is expected that appropriate management of surface water can be achieved. To help ensure that this is the case Policy CB27 (Landscape Biodiversity and Drainage) of the plan places a requirement for full consideration to be given to such measures from the outset. This policy can also be employed to control impacts on water quality which is most at risk during the construction phase.

1.7 Ecology and the impact on natural habitats

1.8 As part of the landscape and visual appraisal work undertaken consideration has been given within the Councils evidence base to site constraints and key habitats which have the potential to support

particular wildlife (see evidence documents [Cran 036](#)⁴; and 41). In addition regard has also been given to Magic Map which is managed by Defra. This does not record any protected species having been previously recorded within the expansion area although notes the dormouse licences required for Cranbrook Phase 1. None of these provides evidence with which to withhold this or any of the strategic allocations that are being proposed through this plan. Such an allocation does not absolve developers of their responsibility to undertake suitable Phase 1 surveys for each site that they wish to bring forward as well as any species specific surveys found to be necessary. Such work regularly informs the development process, identifying areas of greatest sensitivity and any mitigation required.

Cran016 - Flood Risk Review and Surface Water Drainage Strategy (September 2017):

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

Cran017 - Flood Risk Review and Surface Water Drainage Strategy (February 2019):

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

Cran032 - Landscape and Visual Appraisal - written report:

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

Cran034 – Topography:

<https://eastdevon.gov.uk/media/2272733/hda-02-topography.pdf>

⁴ <https://eastdevon.gov.uk/media/2272724/hda-04-designations.pdf>

Cran037 - District character Area and types:

<https://eastdevon.gov.uk/media/2272727/hda-05-character-areas.pdf>

Cran041 - Landscape features and habitat - south-eastern parcel:

<https://eastdevon.gov.uk/media/2272742/hda-09-landscape-features-and-habitats-south-eastern-parcel.pdf>

<p>1.9 How will the revised plan area ensure that there is no risk of settlement coalescence with Rockbeare?</p> <p>1.10 Both the masterplan and the Policies Plan for the DPD have, following public consultation at the Preferred Approach stage, excluded an area of previously proposed development from along the London Road west of the Grange Hotel driveway. This change reflects the Green Wedge afforded to Rockbeare in the Local Plan. While it was previously considered that this provided sufficient safeguard to the identity of Rockbeare, this has now been significantly strengthened to address concerns during the preferred approach consultation.</p> <p>1.11 As such and in recognising the proposed policies of the Cranbrook Plan, there now exists three safeguards which will ensure that there is no settlement coalescence with the village of Rockbeare.</p> <p>1.12 Retained Green Wedge protection provided by Strategy 8 of the Local Plan</p> <p>1.13 Defined built up area boundary around the Cranbrook expansion area – both seeking to restrict the further extension of the expansion area but</p>	<p>Q108 – Prevention of settlement coalescence</p>
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<p>also identifying the open countryside that lies beyond this with its own policy protection.</p> <p>1.14 Recognition of the local topography to ensure that there is no visual relationship between the two settlements by locating development sufficiently far back from the edge of the local escarpment to prevent any perception of coalescence. This is further evidenced in evidence document cran051 and supported by Cran032.</p>	
<p>1.15 What features inform the selection of the eastern extent of this allocation?</p> <p>1.16 Owing to the nature of the topography of the eastern side of the allocation where there is only gently sloping land down to a stream corridor the selection of this boundary is in relative terms less sensitive. However it has been determined by the known availability of land; important hedgerow boundary which lies outside of the stream corridor; the extent of proposed development on the Cobdens allocation to the north and the desire not to simply elongate the settlement beyond that which is necessary. To do so severely risks undermining the placed based approach and sustainability aims.</p> <p>1.17 It is recognised that Cranbrook is already set to be a relatively linear town. This approach is not necessarily beneficial to place making as it risks putting more people at greater distance from the various service hubs that are set to be provided. A balance has therefore been carefully struck which seeks to recognise landscape and policy constraints, the need to deliver housing and the importance that where this is delivered it can function as a sustainable community with all future residents within an appropriate distance of a neighbourhood centre.</p>	<p>Q109 – Features that inform extent of allocation</p>

<p>1.18 What is the justification of the allocation south of the London Road? Were any undertakings given in the EDLP that development would not encroach south of the London Road?</p> <p>1.19 There were no policy undertakings given within the Local Plan which set out that development would not extend south of the London Road. Strategy 12 of the Local Plan is clear in recognising two strategic allocations – now known as Bluehayes and Cobdens, but a commitment to find land for an additional 1550 dwellings within an area of search. This area is defined on the Local Plan Policies plan and encompasses land to the north and south of London Road.</p> <p>1.20 As noted within the response to Q109, there are a number of constraints to development north of the London Road – most notably both the higher land to the north of Cobdens and the railway line, the latter having few crossing points and these not currently suitable to sustainable significant housing which would otherwise be divorced from the main settlement. As such it was never going to be possible to accommodate some or all of the 1550 dwellings identified within Strategy 12 without coming south of the London Road. Such an approach is actually beneficial for place making as it helps to draw a more coherent community and starts to strengthen the sustainability of an otherwise very linear settlement.</p>	<p>Q110 – Justification of allocation south of London Road</p>
<p>1.20 What is the compelling reason that the Treasbeare allocation has to provide more of the supporting uses than the Grange?</p>	

- 1.21 There are a number of compelling reasons for Treasbeare providing more of the supporting uses than Grange.
- 1.22 The sports pitches are provided at Treasbeare for the following reasons:
A school is proposed at Treasbeare that can share the sports pitch provision. These sports pitches form one of two sports ‘hubs’, which are distributed at the west and east of the town. The eastern hub already exists in the existing permission for Cranbrook (03/1900/MOUT) at the former Ingram’s Nursery site. The second hub has been located at Treasbeare to ensure good distribution of sports facilities for the community making the overall settlement more sustainable and attractive.
- 1.23 The area at Grange has less available suitable space for the sports pitches, and placing sports pitches at Grange risks making this area less unattractive to bring forward.
- 1.24 The school is provided at Treasbeare rather than Grange for the following reasons:
- A school is proposed at Cobden’s where it is likely to be delivered early due to the land being in the control of one developer and having a larger on site population which helps to maximise accessibility to the greatest number of pupils although serve both Cobden’s and Grange making another school at Grange unnecessary.
 - Treasbeare provides a school where Grange does not as it provides a sustainable distribution of education facilities.
- 1.25 The employment area is provided at Treasbeare rather than Grange for the following reasons:

**Q111 –
Distribution of
supporting
uses between
Grange
Treasbeare**

- Part of the land area at Treasbeare is adjacent to the airport and exposed to average noise levels that make it unsuitable for housing. However, the land is suited to employment use.
- Treasbeare is better suited to employment provision as it is close to the Sky Park and Science Park helping to form a multi-sector business cluster.
- The area at Grange is smaller and providing employment space in this area could risk visual encroachment on the views from Rockbeare and the surrounding areas
- The smaller available area at Grange means that allocating significant employment provision here risks the area becoming less attractive to deliver.

1.26 Taken together, these reasons make Treasbeare a more suitable area for the delivery of the supporting uses which result in a direct land take. However the Cranbrook IDP seeks to equalise residual costs across the expansion area so that the direct costs associated with increased on site infrastructure at Treasbeare remains equal to the offsite contributions that would be generated by development in Grange.

1.27 **What is the delivery mechanism for the commercial development on London Road?**

1.28 The commercial development associated with the Grange expansion area and which is proposed along the London Road is seen as being developed incrementally as needs, ambitions and opportunities are identified by the local residential community and wider business community at Cranbrook.

Q112 – Delivery mechanism for commercial development

1.29	The commercial development is seen as being delivered over a long timescale and requires the whole of the plan period to be successfully brought forward. Traditionally towns are not built in such a short period of time and therefore the needs of commercial enterprises and the space they occupy will evolve with time.	
1.30	At this stage it is important that the framework for the success of such areas is provided. This means that the houses and apartments that are needed to provide homes to people who will support the centres are delivered. This helps to maintain the housing trajectory previously proposed and can give confidence to the Plan as a whole. In addition it is expected that phased over the plan period will be the delivery of adaptable commercial units together with meanwhile space. This approach of adaptable units and space allows for the future evolution and growth of the commercial areas as conditions change.	
1.31	The delivery mechanism is therefore one that combines contributions from developers, input from commercial interests that identify this area as suitable for their business needs, and community input as they identify needs that they wish to bring forward.	
1.32	The meanwhile space is also seen as being able to host temporary uses prior to the development of permanent buildings. These temporary spaces will enable services to be delivered without the risks involved in high capital development projects which would also be able to test the market and see whether such uses would have long term sustainability.	
1.33	Does reference to A5 Use Class premises accord with national policy in para 91c of the Framework [applies also to CB3 and CB4]	Q113 - A5 use restriction and National Policy

- 1.34 The Council consider that the inclusion of A5 use class premises would not undermine national policy as set out in para 91c of the National Planning Policy Framework and therefore accords with the policy framework for supporting healthy lifestyles.
- 1.35 As well as providing much needed housing to meet the growing need of the population, The Cranbrook Plan looks to embed within it the principles of designing good health and well-being outcomes into the town and encouraging people to lead active lifestyles.
- 1.36 To enable and support healthy lifestyles, especially where this would address identified local health and well-being needs, the plan seeks to provide accessible infrastructure to include facilities, local shops and as part of this access to healthier food. This is not to exclude A5 (Hot food takeaway) uses completely but to provide a focus towards good health and well-being related food outlets in the town that will support residents in making balanced and healthier choices.
- 1.37 The Government commissioned [Foresight Report](#)⁵ of 2007 which examined the reasons for the rising and significant levels of obesity, concluded that there were a 'complex web' of factors involved ranging from unhealthy diets, low levels of physical activity as well as subtler causes such as societal influences and environmental factors which can make it difficult to make healthy choices.
- 1.38 Recognising the relationship between the health impacts, nutrition and hot food takeaways, evidence suggests that the presence of hot food takeaways in high numbers has a relationship with increased levels of excess weight and obesity. The proposed policy approach therefore

⁵ <https://www.gov.uk/government/publications/reducing-obesity-future-choices>

<p>seeks to limit the amount of A5 uses to 1 unit of A5 use class for every 3 units of other A use classes within the neighbourhood centres. This will be a cumulative calculation, taking into account any existing premises. It is considered that this approach would not lead to an over concentration of A5 uses within any one individual centre.</p>	
<p>1.39 Is the siting of the local centre justified and effective? Is it deliverable?</p> <p>1.40 The local centre is justified and effective.</p> <p>1.41 The siting of the local centre along the London Road makes best use of the passing trade that this road is likely to bring. In addition, this location mirrors the location of the local centre for the Cobden’s expansion area so that the two combined areas enable a more attractive centre to be developed, attracting more customers and businesses and creating a more economically sustainable development.</p> <p>1.42 Combining the two local centres of Cobden’s and Grange on the London Road enables them to form a ‘critical mass’ of commercial, community and leisure activity to form a more vibrant centre. This in turn creates a vibrant and more attractive entry to Cranbrook as a whole, while also increasing the attractiveness to passing trade.</p>	<p>Q114 – justification for the siting of local centre</p>
<p>1.43 Is the allocation of Percy Wakely Woods as part of the SANGS justified and effective?</p> <p>1.44 The identification of Percy Wakley woods as part of the SANGS provision is justified and effective. Natural England have walked the</p>	<p>Q115 – Justification of Percy Wakley Woods allocation</p>

woods with Officers from the Council and consider that with appropriate management the woodland has the potential to make good SANGS. It is already of a more open nature and therefore more attractive and welcoming than for example is the case with a dense conifer plantation. Taken together with the surrounding farmland which is also proposed as SANGS, the woods have the potential to provide a different experience to future users and therefore strengthen the value of this block of land as SANGS.

1.45 Currently the proposals map only marks the southern block of woodland as being identified as potential SANGS. However there is much merit in similarly identifying the northern block which Natural England support. The woodland Trust who own both blocks of connected woodland are supportive of the principle for their woods being so described and managed. This is therefore a suggested change to the Policies Map which will be recorded under AQ10 below

1.46 **What is the impact of development on the Grange Parkland and its wildlife and ancient trees / woodland? Would the proposed layout enable the retention of key parkland trees?**

Q116 – Impact of development on Parkland

1.47 Analysis of the Grange Parkland and old maps of the area indicate that the trees within it originated within field boundaries which had been removed to form this larger enclosure. Agricultural use of the field including recent ploughing has reduced the parkland characteristics and wildlife value of this site. The masterplan therefore addresses this site as one that contains high value trees and other green infrastructure but not as parkland. The masterplan uses the recommendations from the landscape evidence to retain the important trees in this site, placing them within an area of green space with the northern half of the site that

<p>is otherwise used for housing, while the southern section of the site is protected within an area allocated for SANGS.</p> <p>1.48 Within the Council’s masterplan, the area of retained greenspace that includes the trees and is located in the northern part of the site, is proposed to link directly with the area to the south (the SANGS allocation), ensuring that it retains the maximum value for wildlife once development takes place.</p>	
<p>1.49 What is the purpose of the Comprehensive Development Scheme in relation to this allocation?</p> <p>1.50 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.</p> <p>1.51 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.</p> <p>1.52 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</p>	<p>Q117 – Purpose of Comprehensive development scheme</p>

<p>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.</p> <p>1.53 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 entirely manage their own CDS. If this threshold was set at 80% it would facilitate the delivery at Bluehayes, Treasebeare 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>1.54 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>1.55 AQ10. Are any Main Modifications proposed in relation to Issue 10?</p> <p>1.56 1. In response to Q115, it is proposed that the Policies map be amended to show both areas of woodland that form Percy Wakley Wood as being identified as suitable for SANGS.</p> <p>1.57 2. Policy CB5 second paragraph to read:</p>	<p>AQ10 – Main modification</p>

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 Cobdens 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.

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

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

Appendix 1: Correspondence from Mr Mingo