
Cranbrook Plan 2013-2031 Examination

Devon County Council Statement:
Response to consultation on additional
viability documents submitted by EDDC

Statement Prepared 18th August 2021

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1. Introduction

- 1.1.1 This statement provides a response by Devon County Council (DCC) to the current consultation on additional viability documents submitted by EDDC which is being carried out by the Inspector for the Cranbrook Plan Examination. It is provided without prejudice.
- 1.1.2 This statement should be read alongside previous statements submitted by DCC for the Cranbrook Plan Examination, in particular PSD 13 (DCC Additional Information on Cranbrook Infrastructure Delivery Plan prepared 5.2.20); PS3 26 (DCC's Revised request for public transport S106 contributions from the Cranbrook Expansion Areas Statement Prepared 14th July 2020) and DCC's statements for Examination Matter 14: Infrastructure Delivery, Examination Matter 9: Infrastructure Delivery and Stage 2 Questions AQ14 – AQ15.
- 1.1.3 The comments set out in this further statement focus upon those issues in which Devon County Council (DCC) has a specific interest in order to fulfil its statutory responsibilities in terms of planning and infrastructure (in particular as the Local Highway Authority and Local Education Authority, and for provision of Children's and Adult Social Care services).

2. Summary of DCC approach and position

- 2.1.1. The County Council has worked closely with East Devon District Council throughout the preparation of the Cranbrook Plan including providing advice to inform the development of policies and proposals. This has included the attendance of numerous meetings, the preparation of evidence reports and the submission of representations at formal stages in the plan making process. This approach has drawn on the expertise of a number of county officers from various service areas including education, transportation, flood risk, waste management, adult, children's, youth and library services.
- 2.1.2. Overall, DCC supports EDDC's additional viability documents and its revised Cranbrook Infrastructure Delivery Plan and proposed Main Modifications. Further comments about some of the details of the additional viability documents which are of particular interest to DCC are provided below.

3. Comments on PSD 35 Cranbrook Plan IDP June 2021 (and related parts of PSD 34 and PSD 36)

- 3.1.1. In general, DCC supports the revised IDP updated June 2021 (PSD 35) with its retention of infrastructure items due to be provided by DCC, along with the stated costings. DCC has already explained the importance of these infrastructure items alongside their costings in previous statements including PSD 13 (DCC Additional Information on Cranbrook Infrastructure Delivery Plan prepared 5.2.20); PS3 26 (DCC's Revised request for public transport S106 contributions from the Cranbrook Expansion Areas Statement Prepared 14th July 2020) and DCC's statement for Examination Matter 14: Infrastructure Delivery. Whilst recognising ongoing concerns about viability, DCC seeks to avoid further reduction in s106 contributions towards the necessary community infrastructure being provided by DCC.

- 3.1.2. **IDP item 40 Extra Care Housing (pdf page 39):** In recognition of the importance of Extra Care Housing, DCC supports the change in the priority level to 'Critical', and the revised figures stated for total project cost (£10,340,000) and Residual Funding Gap (£6,840,000). DCC is pleased to note the retention of this contribution which was supported by the Inspector in her letter dated 20.1.21 (PSD 33). As detailed in DCC's statement for Examination Stage 2 Questions AQ14 – AQ15 para. 2.1.4, DCC considers it necessary for a s106 contribution of £3.5m to be provided to part fund an Extra Care Housing scheme at Cranbrook. This is required to enable DCC to meet its statutory requirements to provide care for people with eligible needs (assessed under the Care Act 2014) who are also eligible for funding assistance by placing them in below market value affordable accommodation. Provision of Extra Care Housing at Cranbrook is considered necessary to fulfil the requirements of Cranbrook Plan policies CB 16 and 22 to have a mix of housing types in order to provide a balanced community, as well as NPPF paragraphs 61, 62 and 73.
- 3.1.3. **IDP item 45 Special Educational Needs (SEN) provision (pdf page 41):** DCC welcomes the change in the priority level to 'Critical' reflecting the need to ensure statutory responsibilities to provide pupil places are met, as requested in previous DCC statements including its statement for Examination Matter 9: Infrastructure Delivery, para 2.1.4.
- 3.1.4. **IDP item 48 Car club vehicles and/or e-bike docking stations (pdf page 41):** DCC welcomes the change in the priority level to 'Important' to reflect the need to promote sustainable travel, as previously requested in DCC Statements including its statement for Examination Matter 9: Infrastructure Delivery, para 2.1.5 and DCC's consultation response to the Submission Draft page 14.
- 3.1.5. **IDP items 52 and 61 Highways infrastructure (pdf pages 42 and 43):** DCC is content with the proposed change to omit the Treasbeare Bluehayes Bridge from the IDP (PSD 35, pdf page 42, item 52), leaving a residual budget of £500,000 for an enhanced at-grade pedestrian crossing. Similarly, the proposed change from a Cobdens Lane Roundabout to a revised junction with reduced land take (potentially an enhanced right hand turn junction with feeder lane) is accepted (PSD 35 pdf page 43 item 61, as proposed by EDDC PSD 34 page 30). The details of these highways measures will need to be addressed through the relevant planning applications.
- 3.1.6. **IDP items 14, 15 and 16 London Road Upgrade Works (pdf pages 37, 38 and 34 respectively):** DCC supports the categorisation of the Section 278 London Road Upgrade works as Category 3 in the revised IDP and Policy CB6, thereby allowing the developers to deliver road improvements necessary to make their scheme acceptable.
- 3.1.7. **IDP Item 49 Public Transport (pdf page 42):** DCC notes retention of the £6,378,000 contribution towards bus enhancement measures and a rail feasibility study, based on the need identified in PSD 26 DCC's Revised request for public transport S106 contributions from the Cranbrook Expansion Areas Statement Prepared 14th July 2020.
- 3.1.8. However, EDDC has stated in other submitted documents (in particular EDDC documents PSD 34 page 3 and PSD 42 page 3) that it is still negotiating with the developers on saving an additional £4m from the Cranbrook IDP in part by reducing the Public Transport contribution by £2,380,000 and is seeking the Inspector's views on this. There have been recent discussions between DCC and EDDC about this potential reduction. DCC would prefer this saving not to be made but will accept it should the Inspector deem it necessary. DCC considers it important to retain as much as possible of the £3,375,000 contribution for increasing the bus service to a 10 minute frequency (on top of the

£2,025,000 for delivering the 15 minute frequency and the £728,000 for evening and Sunday services) which were detailed in PSD 26 (DCC's Revised request for public transport S106 contributions 14th July 2020). DCC would like to highlight the following additional benefits of a 10 minute bus service frequency, compared to a 15 minute frequency:

- a. A 10 minute frequency would allow three bus route variations within Cranbrook giving greater flexibility to serve the new phases of the development. A 15 minute frequency could only serve the existing route and one other, meaning parts of the new developments may be some way from the bus service.
- b. A 10 minute frequency provides additional capacity, as more journeys are able to be operated by double deck buses. With a 15 minute frequency, journeys that continue to Honiton and Axminster are restricted to single deck buses, so four journeys per hour would have a maximum capacity of 226 seats – 2 x 38 seat single and 2 x 75 seat double deck. A 10 minute frequency increases the number of seats to 376 per hour.
- c. A concern remains that overall capacity with a 15 minute service will prove inadequate and deter people from using the service.

4. **Comments on PSD 34: Infrastructure Phasing Diagram and Revolving Infrastructure Fund**

- 4.1.1. DCC notes the **Infrastructure Phasing Diagram** shown as Appendix 3 (pdf page 38) of PSD 34. The Council is content with the phasing timescales for the two primary schools subject to this ensuring that the triggers for delivering these new schools as stated in Policy CB7 (Phasing) are met. DCC is also satisfied with the Appendix 3 phasing timescales shown for children's/youth/library fit out costs and the upgrading of London Road.
- 4.1.2. However, Appendix 3 does not indicate the timescales for the provision of s106 contributions towards other DCC infrastructure in particular off-site walking & cycling; shared cars & e-bikes; Extra Care Housing; sustainable transport; and the SEN school. DCC stresses the need for timely provision of contributions to fund delivery of this infrastructure at the earliest opportunity to enable the necessary education infrastructure to be provided, sustainable travel patterns to be established from the outset and delivery of Extra Care Housing to meet the needs of the growing town.
- 4.1.3. DCC welcomes the establishment of the proposed **Revolving Infrastructure Fund** as detailed in PSD 34 pages 5 - 6 subject to it not delaying provision of contributions for infrastructure/infrastructure delivery at the necessary time. DCC would welcome further details on how the fund will be administered to ensure this, including the potential for enabling early delivery of necessary infrastructure.

5. **PSD 43: Draft Main Modifications Part 1 Policies CB2 – CB7**

- 5.1.1. DCC supports the Main Modifications proposed in PSD 43, having discussed the relevant modifications with EDDC. In particular, DCC is content with the following modifications:
 - a. Policy CB6 **Modification MM40** - which specifies the infrastructure items falling within each of the four categories. DCC supports the clarity that including this wording within CB6 provides to all parties.

- b. **Education Modifications numbered 7, 15, 27, 28, 41, 45 and 48** - which provide further flexibility over the delivery and phasing of the new primary schools, and clarity over the expectations for each expansion area relating to education infrastructure.
- c. **Transport Modifications numbered 8 and 42** - which respectively address highways concerns and the infrastructure category for the London Road Upgrade works (the latter noted in paragraph 3.1.6 above).
- d. **Hot Food Takeaway units Modifications numbered 14, 26 and 37** - which address the changes in the Use Class Order and ensure that the policies reflect relevant sections of the NPPF and NPPG relating to healthy and safe communities and PHE February 2020 guidance¹ on using the planning system to promote healthy weight environments.
- e. **Gypsies & Travellers Sites Modifications numbered 18 and 30** - which are more precise about the role of the allocation and policies plan.

- 5.1.2. The County Council has also discussed and agreed several other main modifications not shown in PSD43, relating to Policies CB8 onwards. This includes a modification to Policy CB9 which is accepted by DCC subject to additional supporting statement text being added to the end of supporting statement s.3.70 for Policy CB10 stating: "*Safeguarding of land for a second station will support the longer term ambition to deliver a second station at Cranbrook. It is envisaged that this would require Government/third party funding to deliver.*"

¹ Public Health England guidance dated 7.2.20: Using the planning system to promote healthy weight environments – Guidance and supplementary planning document template for local authority public health and planning teams.

Available at: [Healthy weight environments: using the planning system - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/healthy-weight-environments-using-the-planning-system)