



The Planning Inspectorate

Independent Examination of the Cranbrook Local Plan

Inspector's Draft Matters, Issues and Questions for Examination

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Inspector appointed by the Secretary of State

Date: 29 November 2019

Cranbrook Local Plan: Matters Issues and Questions (MIQs)

These MIQs should be read in conjunction with the Inspector's Examination Briefing Note. Document references refer to the Local Plan Examination Library which can be found on the Examination web site

<https://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-examination/#article-content>

This note contains the main issues that I have identified in order to determine the soundness and legal compliance of the Cranbrook Local Plan (hereafter referred to as the Plan). These will form the basis of the hearing sessions to be held. Furthermore, it poses both general and specific questions that I have in relation to the soundness of the Local Plan and which can be addressed in any hearing statement. General advice about statements is contained in my guidance note but there is no need for every question to be covered.

In setting them I have had regard to Section 3 of the National Planning Policy Framework which sets out in broad terms what Local Plans should do. The Council should also consider this in addressing the questions below.

Should, as a result of these questions, changes be proposed to any of the policies or text then these should be included in a schedule of proposed changes. This should be kept up-to-date and the latest version published prior to the examination hearings.

Rejected/Omission Sites

It is not part of my role to examine the soundness of rejected or alternative sites put forward by representors. Consequently, discussion at the hearing sessions and in response to the MIQs should focus on whether the proposed employment and housing allocations in the submitted plan are sound.

Matter 1: Legal Compliance, including the Duty to Co-operate

Issue 1:

Overall, has the Plan been prepared in accordance with the relevant legal requirements?

- Q1. What are the relevant strategic matters in relation to the DTC? (Defined as matters having a significant impact on at least two planning areas¹)
- Q2. Has the Plan been prepared in accordance with the Local Development Scheme [LDS 2018]?
- Q3. Has the Plan been prepared in accordance with the Council's Statement of Community Involvement [SCI] and met the minimum consultation requirements in Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) [Local Plan Regulations]?
- Q4. Is the plan compliant in relation to the East Devon Local Plan 2016 (EDLP)?
- Q5. What would be the implications for the plan delivery of the continued protection of the green wedges identified in the EDLP?
- Q6. Is the Plan legally compliant with national policy, the provisions of the Planning and Compulsory Purchase Act 2004 (as amended) [PCPA] and the Local Plan Regulations for the preparation of the plan?
- Q7. Is the Local Plan legally compliant with respect to Sustainability Appraisal [SA]?
- Q8. Is the Local Plan legally compliant with respect to the Habitats Regulations and any requirement for Appropriate Assessment [AA]?
- Q9. Does the Plan make it clear, as required by Part 4, paragraph 8(5) of the Local Plan Regulations, which parts of the existing development plan it will supersede?
- Q10. In what way are the expansion areas CB2 to CB5 strategic policies in the context of paragraphs 20 to 23 and 28 of the National Planning Policy Framework (The Framework) and the Planning Practice Guidance (PPG)?
- Q11. Given the date range of the plan; how do the strategic policies look ahead a minimum of 15-years from adoption, to anticipate and respond to long term requirements and opportunities as required by paragraph 22 of the Framework?
- Q12. Is the Plan period 2013 - 2031 justified; and how has it been arrived at?

¹ S33A(4) of the Planning and Compulsory Purchase Act 2004

Additional Question:

AQ1. Are any Main Modifications proposed in relation to Issue 1?

Issue 2:

Is the Plan's preparation compliant with the Duty to Co-operate [DTC] imposed by Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended) [PCPA]?

- Q13. DTC statement says that it is not intended to address or affect any needs arising as a result of growth beyond East Devon. That planned at Cranbrook is said to be 'self-contained' in the plan area? However, to what extent could/should Cranbrook be accommodating unmet need from adjacent districts? Is any element of the housing number intended to provide for any housing need from beyond EDD (particularly given that Exeter do not have a 5-year supply and transport accessibility into Exeter from Cranbrook by rail is accessible)?
- Q14. What, if any, is the synergy between this plan and the Greater Exeter Strategic Plan (GESP)
- Q15. Who did the Council co-operate with? What has been the nature and timing of co-operation with others and on which issues?
- Q16. Have the viability toolkit questions been disclosed, if not has this compromised the Duty to Co-operate?
- Q17. Are there any failures in the DTC?
- Q18. What consideration has been given to the Cranbrook settlement having the capacity to fulfil unmet need elsewhere?
- Q19. Were any standing arrangements/protocols/memorandums of understanding in place in relation to the housing figure?
- Q20. How has any co-operation with neighbouring councils influenced the preparation of the Cranbrook Local Plan?
- Q21. To what extent is the Plan consistent with made Neighbourhood Plans in the area, including the Rockbeare and Broadclyst Station Neighbourhood Plans?

Additional Question:

AQ2. Are any Main Modifications proposed in relation to Issue 2?

Matter 2 – Soundness of the Local Plan

Issue 3:

Is the Plan based on a sound process of Sustainability Appraisal?

- Q22. Has the Plan followed a sound process of SA?
- Q23. Has the SA been undertaken at each stage of the Plan's preparation to clearly justify the Council's policy choices?²
- Q24. Does the SA process represent the only site selection methodology? Have other methods been used?
- Q25. How has the SA tested against reasonable alternative sites?
- Q26. Has the SA been robustly prepared with a comparative and equal assessment undertaken of each reasonable alternative?
- Q27. Are the reasonable alternatives sufficiently distinct such that meaningful comparisons can be made of the different sustainability implications?
- Q28. Does it represent an appropriate strategy in the circumstances?
- Q29. Does the final report set out the reasons for rejecting earlier options?

Additional Question:

AQ3. Are any Main Modifications proposed in relation to Issue 3?

Issue 4:

Is the Local Plan justified, effective and consistent with national policy in respect of the Habitats Regulations?

- Q30. Is the Local Plan legally compliant with respect to the Habitats Regulations and any requirement for Appropriate Assessment [AA]?
- Q31. Has the position of Natural England re the SOCG been finalised?
- Q32. Can the Council comment on the recommended changes to policy wordings from table 2 of the HRA?

Additional Question:

AQ4. Are any Main Modifications proposed in relation to Issue 4?

Issue 5:

Is the Local Plan justified, effective and consistent with national policy in relation to Climate Change?

² Section 19(5) of the 2004 Act

- Q33. Taken as a whole, will the Plan policies be effective in mitigating and adapting to climate change, including supporting the transition to a low carbon future?
- Q34. Has sufficient provision been made in the plan to address Climate Change in accordance with Section 19(1A) of the 2004 Act?
- Q35. What provision has been made for carbon offsetting?
- Q36. How much of the Cranbrook extension will be served by the CHP plant? Reference is made to Cranbrook and the west end of East Devon; what is the total capacity re the number of homes that could be serviced?

Additional Question:

- AQ5. Are any Main Modifications proposed in relation to Issue 5?

Matter 3 – Housing Strategy

Issue 6:

Is the Local Plan positively prepared, justified and effective in respect of housing?

- Q37. Will the Plan provide for a choice and mix of housing to meet the needs of different groups in the community?
- Q38. Do the expansion area policies provide sufficient clarity and guidance for Plan users and are any main modifications necessary for soundness?
- Q39. Does the amount of housing proposed for Cranbrook accord with the EDDP taking into account the following: built homes, those with planning permission, previous allocations which have been subsumed into the new expansion areas and those now proposed in the plan which have not been previously allocated?
- Q40. Is the housing figure given in the EDDP still relevant and are the expansion areas as a whole (CB2 to CB5) consistent with the EDLP?
- Q41. What is the justification for additional greenfield sites at Cranbrook in preference to utilising the existing supply of brownfield sites within the district which could reasonably meet a proportion of the need?
- Q42. Is the reference in Policy CB6 to residential development on non-allocated sites and the contribution they should make to infrastructure sufficiently clear to inform owners of the requirements?
- Q43. Through what mechanisms will the comprehensive development schemes referred to in CB2 to CB5 be delivered?
- Q44. How do the comprehensive development schemes required in each of the expansion area policies (CB2 to CB5) relate to the requirements for comprehensive phasing strategies (Policy CB7) and the masterplan (CB16)?
- Q45. What is the status of the Masterplan in relation to Policies CB2 to CB5; CB16 and to the Plan in general?
- Q46. What is the justification for the difference in numbers of pitches incorporated into the expansion areas to meet the needs of gypsy and traveller communities?
- Q47. Is there robust evidence to demonstrate that expansion areas and infrastructure would be delivered at a sufficient rate and suitable timescale to meet the Plan's housing targets given historic build out rates and the aspirations for 500 completions per year.

Q48. How does the plan make specific provision for the housing needs of older and disabled people? How might the approach be adjusted to meet the identified needs for these groups?

Additional Question:

AQ6. Are any Main Modifications proposed in relation to Issue 6?

Matter 4 – Bluehayes Expansion Area

Issue 7:

Is the Bluehayes Allocation (Policy CB2) positively prepared, justified and effective?

Q49. 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?

Q50. Has full consideration been given to the impact of this allocation on:

- 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.

Q51. Is the mixed-use allocation at Bluehayes appropriate? What is the rationale for mixed use development?

Q52. Has full consideration been given to the impact of this development on the residents at Broadclyst Station?

Q53. How has the presence of the existing small holding been reflected in the allocation?

Q54. How will the allocation secure the identity of Broadclyst Station as a separate community?

Q55. Do the provisions of the allocation accord with the Rockbeare Neighbourhood Plan?

Q56. What is the purpose of a Comprehensive Development Scheme in relation to this allocation?

Additional Question:

AQ7. Are any Main Modifications proposed in relation to Issue 7?

Matter 5 – Treasbeare Expansion Area

Issue 8:

Is the Treasbere Allocation (Policy CB3) positively prepared, justified and effective?

- Q57. 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?
- Q58. Has full consideration been given to the impact of this allocation on:
- a) Access arrangements
 - b) Landscape impact
 - c) The relationship with the airport including the flight path and the engine testing facility in respect of noise?
- Q59. What is the justification for development on land identified as green wedge within Strategy 8 of the adopted Local Plan?
- 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)?
- Q61. What is the justification for the scale of the neighbourhood centre proposed?
- Q62. What is the justification for inclusion of land within Rockbeare Parish in the Treasbeare allocation?
- Q63. What is the Visual impact of the playing fields at Treasbeare on the green wedge and on the proposed SANG?
- Q64. Does the Masterplan represent the only strategy for the development of this site? Would it be appropriate?
- Q65. Is the siting of a 5 pitch Gypsy and Traveller site at the eastern extent of Treasbeare appropriate?

- Q66. Does reference to A5 Use Class premises accord with national policy in para 91c of the Framework? [applies also to CB4 and CB5]
- Q67. Has full consideration been given to the impact of this development on air quality and its' proximity to the airport?
- Q68. Is the employment allocation at Treasbeare justified? What is the rationale for the extent and location of this allocated land?
- Q69. Should Suitable Alternative Green space provision (SANG) only be brought forward in accordance with the needs of a specific development and not to address failure to deliver elsewhere?
- Q70. Do the provisions of the allocation accord with the Rockbeare Neighbourhood Plan?
- Q71. What consideration has been given to the provision of the local centre in respect of multiple land ownership and delivery issues?
- Q72. How has the figure of around 915 dwellings for this allocation been arrived at? Is the allocation capable of accommodating a larger capacity of new housing?
- Q73. What is the purpose of a Comprehensive Development Scheme in relation to this allocation?

Additional Question:

- AQ8. Are any Main Modifications proposed in relation to Issue 8?

Matter 6 – Cobden’s Expansion Area

Issue 9:

Is the Cobden’s Allocation (Policy CB4) positively prepared, justified and effective?

Housing numbers

Q74. 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?

Q75. Has full consideration been given to the impact of this allocation on:

- a) Access arrangements
- b) Landscape impact
- c) Flood risk and drainage?

Q76. How has the figure of around 1495 dwellings for this allocation been arrived at?

Q77. What is the purpose of a Comprehensive Development Scheme in relation to this allocation?

Mixed Use

Q78. Is the allocation of mixed-use areas justified and effective?

Q79. Does reference to A5 Use Class premises accord with national policy in para 91c of the Framework? [applies also to CB3 and CB5]

New station

Q80. Would the allocation of housing in Cobden’s be justified if a second station were not to be delivered?

Q81. What is the delivery mechanism for the second station?

Q82. Would the creation of a new station affect the timings of services at Whimple station due to capacity on the line; what consideration has been given to this issue in the planning of the second Cranbrook station?

Q83. How will this land be treated (to what use will it be put) during the period which it will be safeguarded from other development?

Settlement coalescence

- Q84. How will development east of Cobden's Lane ensure that there would be no risk of settlement coalescence with Whimple (including encroachment into Whimple Parish)?
- Q85. Would the allocation of a site at Cobden's reflect the provisions of Strategy 7 in the EDLP, with particular regard to criteria 1 to 3?
- Q86. Were any undertakings given in the EDLP that the area between Cranbrook and Whimple was to remain separate to provide a green buffer space between the settlements?
- Q87. What is the justification for development on land identified as green wedge within Strategy 8 of the adopted Local Plan?
- Q88. Has full consideration been given to the impact of the development on archaeology and heritage assets?

Pylons

- Q89. What are the objective criteria behind the recommendation to underground only 1 of the two overhead lines?
- Q90. Is the undergrounding of pylons practical and viable for developers?
- Q91. In the event that pylons are not undergrounded how would this affect the robustness of this land as a housing allocation?
- Q92. How is the proposal to underground the overhead lines consistent with the Plans overall objectives 1- 3 (pg. 3)?

Cobden's Lane Closure

- Q93. Has full consideration been given to the impact of the proposed development upon the highway network, in particular the closure of the southern end of Cobden's lane and the movement of farm vehicles?

Sports pitches

- Q94. Would the siting of a Junior Sports Pitch (JSP) away from the main sports hub be justified and effective?

Gypsy and traveller provision

- Q95. What is the rationale for the siting of the 10 pitches at the Cobden's Lane site to accommodate the gypsy and traveller community in respect of the sites' location and accessibility to facilities and services?
- Q96. How does the location of the provision accord with government guidance on the provision of sites?
- Q97. How has the landscape impact of the expansion areas been fully considered by the Council?
- Q98. Is the extent of the provision of Gypsy and Traveller sites in Cranbrook appropriate?
- Q99. Does the distribution of Gypsy and Traveller pitches reflect the spatial strategy and the identified need within East Devon District?

- Q100. What is the rationale for the split of 15 pitches over two sites within Cranbrook?
- Q101. Would the location of the Gypsy and Traveller site have an impact on the viability of Cobden's allocation?
- Q102. Is the allocation of the site at Cobden supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?

Other queries

- Q103. Has full consideration been given to the impact of the development on archaeology?
- Q104. Is the siting of the cemetery provision justified and effective?
- Q105. Is the siting of the SEN education facility justified and effective?

Additional Question:

- AQ9. Are any Main Modifications proposed in relation to Issue 9?

Matter 7 – The Grange Expansion Area

Issue 10:

Is the Grange Allocation (Policy CB5) positively prepared, justified and effective?

Q106. 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?

Q107. Has full consideration been given to the impact of this allocation on:

- a) Access arrangements.
- b) Landscape impact.
- c) Flood risk management and water quality.
- d) Ecology and the impact on natural habitats.

Q108. How will the revised plan area ensure that there is no risk of settlement coalescence with Rockbeare?

Q109. What features informed the selection of the eastern extent of this allocation?

Q110. What is the justification of the allocation south of London Road? Were any undertakings given in the EDLP that development would not encroach south of London Road?

Q111. What is the compelling reason that the Treasbeare allocation has to provide more of the supporting uses than the Grange?

Q112. What is the delivery mechanism for the commercial development on London Road?

Q113. Does reference to A5 Use Class premises accord with national policy in para 91c of the Framework? [applies also to CB3 and CB4]

Q114. Is the siting of the local centre justified and effective? Is it deliverable?

Q115. Is the allocation of Percy Wakely Woods as part of the SANG justified and effective?

Q116. 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?

Q117. What is the purpose of a Comprehensive Development Scheme in relation to this allocation?

Additional Questions:

AQ10. Are any Main Modifications proposed in relation to Issue 10?

Matter 8 – Phasing

Issue 11:

Is the Phasing programme within policy CB7 positively prepared justified and effective?

- Q118. Is the proposed phasing justified and effective? How will the Council ensure that strategies from each expansion area achieve a co-ordinated approach to delivery and a measured release of sites over the plan period?
- Q119. Does the policy rely on multiple landowners reaching agreement? How might uncertainty for owners particularly for smaller land holdings be avoided?
- Q120. Can improved clarity be given to those instances where delivery means making serviced land available and where it means providing buildings?
- Q121. How have the occupation restrictions been validated and how might interim solutions enable the release of funds to deliver the infrastructure?
- Q122. In respect of Paras 3.6 and 3.14; there is an inconsistency in that the plan refers to both Bluehayes and Treasbeare as the first phase. Please can the Council clarify the rationale for the phasing of the expansion areas CB2 to CB5 and the mechanism for securing that programme?
- Q123. How will SANGS be delivered ahead of new housing?
- Q124. If the location of one of the primary schools is to be a choice between one of two expansion areas how does it achieve clarity for landowners and certainty regarding infrastructure costs and timings?

Additional Question:

- AQ11. Are any Main Modifications proposed in relation to Issue 11?

Matter 9 – Infrastructure Delivery

Issue 12:

Is the Infrastructure Delivery envisaged by Policy CB6 justified and realistic?

- Q125. What is the Council's rationale for infrastructure delivery in the manner set out in the plan; which elements are negotiable, and which are fixed? What is the cumulative impact of the infrastructure requirements on viability?
- Q126. Is the Cranbrook Infrastructure Delivery Plan justified and effective? To what extent are the 'strategic' infrastructure projects identified in the IDP necessary for the delivery of the Plan? Is the infrastructure proposed deliverable?
- Q127. The IDP recognises that Treasbeare and Cobden's have higher burdens re infrastructure delivery. How will this policy ensure that these costs are balanced to equate the burden between the remaining expansion areas?
- Q128. How might infrastructure provision/requirements be better balanced between Cobden's and the Grange?
- Q129. How will a fair allocation of costs/responsibilities be achieved?
- Q130. Is Policy CB6 justified and effective? Are the infrastructure requirements consistent with national policy?
- Q131. What is the purpose of the Built-Up Area Boundaries (BUAB) reference in Policy CB6? Why would the allocation boundaries in CB2 to CB5 and the stand-alone policy CB8 be insufficient?
- Q132. How will the Council ensure that the town centre uses are delivered in a manner which would be able to sustain additional homes. What would be the implications of additional phases progressing in the absence of the town centre facilities?
- Q133. How will the increased demand for school places arising from the development be accommodated prior to the completion of the new school? How will this impact on surrounding schools (particularly Whimple Primary School)?

Additional Question:

- AQ12. Are any Main Modifications proposed in relation to Issue 12?

Matter 10 – Specific Policies

Issue 13

Is the policy approach to the Built-up Area Boundaries justified and effective? (Policy CB8)

Q134. Are the Built-up Area Boundaries defined in the plan consistent with the assessment undertaken in the Sustainability Appraisal?

Q135. Is the policy approach to BUABs robust and consistent with the EDLP and national policy?

Additional Question:

AQ13. Are any Main Modifications proposed in relation to Issue 13?

Issue 14:

Is the public transport enhancement policy justified and effective (CB9)?

Q136. What is the delivery mechanism for rail and bus infrastructure improvements outlined in this policy?

Additional Question:

AQ14. Are any Main Modifications proposed in relation to Issue 14?

Issue 15:

Are the London Road Commercial and Retail Proposals in Policy (CB24) deliverable given the alternative retail allocations in the Plan?

Q137. What is the justification for the allocation as a commercial zone given the proximity to the Town Centre allocation? How would the promotion of this area as commercial/retail ensure that the town centre facilities are not undermined?

Q138. How would these commercial provisions relate to Rockbeare and/or Cranbrook?

Additional Question:

AQ15. Are any Main Modifications proposed in relation to Issue 15?

Issue 16**Is the proposal to upgrade the London Road through Policy CB25 appropriate and deliverable?**

Q139. Is the priority given to the upgrading of London Road appropriate and would it be deliverable given the competing demands on the use of funding generated from the development?

Q140. What is the timing of delivery and on what phase of development is it primarily dependant?

Q141. How will proportionate financial contributions be defined?

Additional Question:

AQ16. Are any Main Modifications proposed in relation to Issue 16?

Matter 11 – Affordable Housing

Issue 17

Is CB11 consistent with the EDLP and with National Policy on affordable housing?

- Q142. Cranbrook plan housing provision is at variance with the EDLP. The EDLP indicates 25% affordable housing whereas CB11 substitutes a lower 15% figure (70% of which are affordable rent and 30% intermediate or other tenure). Is this reduced affordable housing provision justified and consistent with national policy? How far do viability issues influence this departure; especially coupled with Cranbrook being CIL exempt?
- Q143. On what basis is a 15% affordable housing figure justified and effective?
- Q144. How will this level of affordable housing provision influence the provision of future infrastructure delivery and phasing?
- Q145. Should Policy CB11 reflect that 30% of AH is comprised "other affordable tenures" as defined within the Framework?
- Q146. Should Policy CB11 be updated with regard to intermediate housing given the more recent Framework wording?
- Q147. Would the requirements for affordable housing and other services and facilities impact upon the deliverability of housing expansion areas in the Plan?

Additional Question:

- AQ17. Are any Main Modifications proposed in relation to Issue 17?

Matter 12 – Employment Land

Issue 18:

Is the Local Plan positively prepared, justified and effective in respect of Employment Land Policies CB2 to CB5?

- Q148. Does the allocation of land for employment when taken together with the expansion areas in CB2 to CB5 amount to the 18.4 hectares set out in the EDLP?
- Q149. How would the employment land set out in Strategy 12 of the EDLP be secured through the phasing programme? Through what mechanism will it be delivered?
- Q150. What has been the take up on Phase 1 at Cranbrook of residents working and living in the Cranbrook Settlement?
- Q151. What evidence is there to indicate that employment provision would sustain the settlement at Cranbrook and deliver sustainable development?

Additional Question:

- AQ18. Are any Main Modifications proposed in relation to Issue 18?

Matter 13 – Infrastructure Phasing

Issue 19:

Are the Infrastructure Phasing Proposals through Policy CB7 positively prepared, justified and effective?

- Q152. How robust is the phasing of key infrastructure in conjunction with the housing expansion areas? How have the issues relating to infrastructure delivery in Cranbrook Phase 1 influenced the development of the phasing policy?
- Q153. How does the approach to infrastructure funding influence the phasing of the four expansion areas?
- Q154. How does Policy CB7 align to the Infrastructure Delivery Plan?
- Q155. Is the phasing strategy justified where the majority of land in three of the four expansion areas appears to be largely controlled by a single developer?
- Q156. There is a time critical relationship referred to between school provision and funding via housing; how realistic is the delivery of the school?
- Q157. Phasing of the school by the 30th Dwelling inextricably links the four expansion areas; what is the rationale behind this approach?
- Q158. Should the primary school be completed prior to the first occupation of any new dwellings in these four expansion areas?
- Q159. What is the mechanism for funding an additional station to serve the development? How robust is the Cobden's allocation without any certainty on the timing or provision of the station?
- Q160. Is it certain that power, water and sewage capacity can be fulfilled for all the additional development expected within the expansion areas?
- Q161. If power lines cannot be placed underground, how might this affect the delivery of the Cobden's allocation?
- Q162. How far will the requirement for a train loop to enable stopping services to be more frequent reduce road traffic into Exeter. What is the delivery mechanism and how realistic is it?

Additional Question:

- AQ19. Are any Main Modifications proposed in relation to Issue 19?

Matter 14 – Infrastructure Delivery

Issue 20:

Are the Infrastructure delivery provisions justified and effective in the light of previous delivery?

Q163. Delivery of facilities to date have been slower than anticipated - what certainty is there around the delivery of further infrastructure and how will this influence future phasing? How realistic is it that all infrastructure would be delivered via contributions from new housing?

Q164. What is the overall per home cost given the headline figures set out below? How would these costs affect the deliverability of any or all of the expansion areas? What proportion of these individual costs are reliant on sources other than residential developments and how will they be secured to ensure timely delivery?

- Primary school 420 place – £7.2m
- Primary school 630 place - £10.8m
- Senior School expansion 4.3m
- SEN school - £1m contribution from Devon CC
- OH wires undergrounding - £3m to 5m
- Highway Infrastructure – costs are unclear – please clarify?
- HRA mitigation – 78 acres SANG – how is this to be funded?
- Clyst Valle Regional Park – funding gap stated as £6.5 m
- Flooding – no infrastructure in contained in the schedule – how will this be funded and by what method will it be secured?
- Heath Medical Practice – proportionate costs of the £16.3 million
- Extra Care housing 55 flats £10.3 million – how are these costs attributed.
- Blue Light emergency services facility – funded from developer contributions – to what extent?
- LEAPS/NEAPs – how will these facilities be funded?
- Bus service £1.7 million cost – £780,000 gap how will these be funded.
- Traffic impact on M5 capacity – what costs are envisaged?

Q165. How does the strategy for expansion address the “integrated community” aspirations of the plan given an apparent imbalance of the provision of facilities in the first phases of Cranbrook?

Additional Question:

AQ20. Are any Main Modifications proposed in relation to Issue 20?

Matter 15 - Viability

Issue 21:

Are the assumptions made regarding land values fully justified in respect of the Viability/Infrastructure Delivery Plan?

- Q166. What evidence is there that the viability assessments reflect the recommended approach in Paragraph 57 of the Framework?
- Q167. Should Travel Planning be listed as critical rather than important in relation to the priority attributed to it? How would this impact on the viability of its delivery?
- Q168. Should the upgrading of London Road be critical given its linkage to Policy CB25?
- Q169. How is the Section 106 allowance of £16,828 per plot arrived at? Does it reflect the actual cost of contributions?
- Q170. Is a breakdown of disaggregated assumed abnormal costs available and how has it featured in the costs per dwelling figure?
- Q171. What is the justification for deviation from the same benchmark rate across the development (eg SANGS).
- Q172. What is the risk associated with a blended benchmarking rate regarding delivery of infrastructure serving Cranbrook?
- Q173. What evidence is there to support the land values used in the assessment?
- Q174. What evidence is there to support the index used for the assessment? Does it reflect current costs or inflation over the interim period?
- Q175. Does the GDV³ used by Three Dragons follow market norms?
- Q176. Has any sensitivity testing been undertaken in respect of the figures used in the housing trajectory?
- Q177. How does the plan adequately acknowledge the value of residential development land lost to infrastructure?
- Q178. What justification is there for the trajectory of housing delivery at Cranbrook in comparison to the actual delivery of units since 2011?
- Q179. To what extent does the higher projection affect the delivery of the overall volume of housing at Cranbrook in relation to housing delivery.

Additional Question:

- AQ21. Are any Main Modifications proposed in relation to Issue 21?

³ Gross Development Value

Matter 16 – Subject Specific Policies (1)

Issue 22:

Is the policy for Self-Build Homes (CB12) justified and effective?

- Q180. What is the justification for the allocation of 4% self-build homes?
- Q181. How would a flexible figure of 4% (reviewed on an annual basis) enable smaller scale developers to commit to land? Should provision be made to enable developers to work with individuals to custom build rather than selling on to a third party?
- Q182. How does the volume of provision align with the number of individuals currently on the Councils register?
- Q183. What is the delivery mechanism for these self-build plots and how will this vary for the delivery of affordable housing self-build development?

Additional Question:

AQ22. Are any Main Modifications proposed in relation to Issue 22?

Issue 23

Is the policy for Zero Carbon (CB13) justified and effective?

- Q184. To what extent is the policy consistent with National Policy?
- Q185. To what extent would the supply of energy be restricted by the requirement to connect to the local CHP provision?
- Q186. Should the policy relate to carbon neutral rather than zero carbon?
- Q187. Can all dwellings within The Grange (and other expansion areas) be within 400m of the basic facilities listed? Would Policy CB13 be effective in relation to the Grange expansion area?
- Q188. Is the requirement for an energy standard above Building Regulations justified?
- Q189. How will a low carbon town model be delivered?
- Q190. Is the conversion of the existing CHP facility to renewable fuels realistic or achievable?
- Q191. How might this policy hinder the delivery of otherwise policy compliant development in advance of infrastructure delivery?

Additional Question:

AQ23. Are any Main Modifications proposed in relation to Issue 23?

Issue 24

Is the policy for safeguarding land for energy uses justified (Policy CB14)?

- Q192. What is the delivery mechanism for the alternative low carbon and renewable energy facility envisaged through policy CB14?
- Q193. Should there be flexibility included within policy CB14 regarding safeguarded land should alternative provision not be delivered?

Additional Question:

AQ24. Are any Main Modifications proposed in relation to Issue 24?

Issue 25:

Is the policy for Suitable Alternative Natural Green Space (SANGS) CB15 justified and effective?

- Q194. Is the SANG funding for maintenance justified and effective, given other green space does not attract funding?
- Q195. Should the policy require that paths within SANGs retain a natural character? If so, should the policy be amended to make this clear?
- Q196. How might the length of SANG walks be addressed given that at 2.3km falls short of the recognised length of 2.5km length walks identified in the HRA?
- Q197. To what extent is the SANG policy compliant with the EDLP policies 47 and 10?
- Q198. To what extent is there justification for the SANG to be in place prior to first occupation of the dwellings?
- Q199. Should SANGS be within or adjacent to the Clyst Valley Regional Park in order to be compliant with the HRA approach?
- Q200. To what extent should the level of SANGS contribution for a site (for example Farlands) be based on existing use value of the alternative land on which it will be provided together with an amount sufficient to accommodate any necessary modification and maintenance thereafter?
- Q201. To what extent should the reliance on other areas for SANG provision be avoided unless a mechanism of compensation/payment exists?
- Q202. Should the wider green infrastructure strategy to which EDDC is committed be provided prior to the implementation of the expansion areas in the plan?

Additional Question:

AQ25. Are any Main Modifications proposed in relation to Issue 25?

Matter 17 Development Management Policies

Issue 26:

Is the approach to Design Codes (CB16) justified and effective?

- Q203. How will the design codes secure a measure of flexibility to allow for changing conditions? To what extent is it intended that the design codes implement the detailed masterplan requirements at Fig 8 and how does the existing wording provide for this?
- Q204. Does the wording of this policy remain robust in the light of the recently published Planning Policy Guidance section on planning for well-designed places?
- Q205. Should the policy make clear whether the design codes are required at outline or detailed planning application stage or in advance of either?
- Q206. What is the justification for the reference to the Masterplan in policy CB16?

Additional Question:

AQ26. Are any Main Modifications proposed in relation to Issue 26?

Issue 27:

Is the approach to Amenity Policy CB17 justified and effective?

- Q207. Does Policy CB17 adequately address development close to the airport, particularly in respect of noise in respect of expansion areas at Treasbeare CB3 and Bluehayes CB2?
- Q208. Is the inclusion of Nationally Described Space Standards (NDSS) justified and consistent with national policy?
- Q209. How might the delivery rates be affected by the introduction of NDSS?

Additional Question:

AQ27. Are any Main Modifications proposed in relation to Issue 27?

Issue 28:

Is the approach to Digital Connectivity Policy CB18 Justified?

- Q210. To what extent does the policy take into account the feasibility of provision and what is the justification for enabling the capacity for more than one provider to be incorporated?

Additional Questions:

AQ28. Are any Main Modifications proposed in relation to Issue 28?

Issue 29

Is the approach to Co-ordinated sustainable travel within CB19 justified and effective

Q211. Is Policy CB19 justified and effective with respect to travel plans, sustainable travel and parking?

Additional Question:

AQ29. Are any Main Modifications proposed in relation to Issue 29?

Issue 30?

Is the approach to plug in and ultra-low emission vehicle charging within Policy CB20 justified?

Q212. To what extent has this policy been designed to be futureproofed and how has the impact on viability and maintenance of off plot facilities been considered?

Q213. How will the maintenance of off plot facilities be achieved?

Q214. How might the viability be affected by the requirement for such provision?

Additional Question:

AQ30. Are any Main Modifications proposed in relation to Issue 30?

Issue 31:

Is the approach to Parking and Cycle provision at Cranbrook within Policy CB21 justified?

Q215. Is Policy CB21 consistent with national policy in respect of cycle parking requirements?

Q216. Is Policy CB21 justified and effective with respect to car parking provision? Should such provision include integral garage spaces?

Additional Question:

AQ31. Are any Main Modifications proposed in relation to Issue 31?

Matter 18 Town Centre

Issue 32:

Is the Cranbrook Town Centre Policy CB22 Justified and effective?

Provision of facilities

- Q217. Is Policy CB 22 consistent with National Policy?
- Q218. How will the expansion areas facilitate the delivery of the town centre which is already consented given the text in paragraph 4.48 of the plan?
- Q219. Is the approach to A5 class uses in the Town Centre consistent with National Policy?
- Q220. How is the approach to A5 class uses consistent with the Policy CB1 in relation to Health and Well-being?
- Q221. What level of confidence is there that the town centre will be delivered and how would this impact on the timing, delivery or phasing of the four expansion areas in the plan?
- Q222. What is the delivery mechanism for the town centre and market square and how will the core infrastructure be provided - particularly given multiple land ownerships?
- Q223. What evidence is available to justify the requirement for residential uses above commercial uses in the Town Centre? How will the requirement for access to shared and private outdoor space be achieved in this regard?
- Q224. What is the delivery mechanism for the neighbourhood centre (in addition to the town centre) given the low take up of premises in phase 1? How might this impact on the proposals?
- Q225. Modular units are referred to; around what core would these operate and how will the 'meanwhile' or temporary uses referred to in the Consultation Statement and Policy CB22 be delivered?
- Q226. How will the town centre public space be maintained and funded in the long-term?
- Q227. How will the proposed market be operated and maintained in the future? What is the sustainability of the proposal?
- Q228. Would any of the new residential development be sustainable without the delivery of the town centre if so, what amount?
- Q229. How will the Council achieve the delivery of the Town Centre prior to any new phases of development?
- Q230. How will the space required for SUDS serving the town centre be delivered?

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Q231. How will the parking requirement for the significant uplift in the average density be delivered in relation to the Town Centre Uses?

Q232. How will the required improvements to the rail crossing be achieved given that some traffic will be drawn from the north of the rail line?

Additional Question:

AQ32. Are any Main Modifications proposed in relation to Issue 32?

Matter 19 – Subject Specific Policies (2)

Issue 33

Other Policy Questions

Q233. To what extent should there be flexibility in the wording of Policy CB14 should the land (either in whole or in part) not be required for the delivery of energy uses longer term?

Additional Question:

AQ33. Are any Main Modifications proposed in relation to Issue 33?

Issue 34

Heritage considerations in respect of Tillhouse Farm redevelopment Policy CB29

Q234. Is Policy CB29 consistent with National Policy in respect of the heritage asset Tillhouse Farm?

Q235. What consideration has been given to securing the future of this site as part of the major expansion of the settlement?

Additional Question:

AQ34. Are any Main Modifications proposed in relation to Issue 34?

Issue 35

Does the plan deal appropriately with protected species?

Q236. What technical evidence is there of protected species, including the skylark which is referred to extensively in representations?

Additional Question:

AQ35. Are any Main Modifications proposed in relation to Issue 35?