

# **Statement for the examination of the Cranbrook DPD**

Response to the Inspectors Matters Issues and  
Questions

Matter 8: Phasing

Date – 8 January 2020

**Contact details**

Planning Department – Cranbrook Team

East Devon District Council

Blackdown House, Border Road, Heathpark Industrial Estate,

Honiton, EX14 1EJ

DX 48808 Honiton

Phone: 01395 516551

Email: [planningcranbrook@eastdevon.gov.uk](mailto:planningcranbrook@eastdevon.gov.uk)

[eastdevon.gov.uk](http://eastdevon.gov.uk)

[@eastdevon](#)

**Contents**

Issue 11: Phasing	4
Q118 - Justified and effective phasing/ co-ordinated approach to delivery	4
Q119 - Reliance on multiple landowners reaching agreement	6
Q120 - Improved clarity to delivery of serviced land available or buildings	7
Q121 - Occupation restrictions and release of funds for infrastructure	7
Q122 - Clarification for the rationale for the phasing of the expansion areas CB2 to CB5	9
Q123 - Ensuring SANGS delivery ahead of new housing	10
Q124 - Clarity for land-owners and infrastructure on Primary School location	11
AQ11 - Main modifications proposed	11
Appendices	13
Appendix 1: There are no appendices attached to this statement	13

## Issue 11: Phasing

Response	Inspectors Question(s)
<p>1.1 <b>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?</b></p> <p>1.2 Phasing of any development is critical to the long term success and in particular the sustainability of place. Essentially it requires appropriate infrastructure to come forward at a particular point in time to support a critical number of people. In this instance Policy CB7 seeks to ensure that phasing within each expansion area is managed through a Phasing strategy agreed prior to the issuing of the first planning permission for each expansion area respectively. For Bluehayes, Cobdens and Treasbeare this is a more simple exercise as there is a single lead developer for each who has control of at least 80% of the respective allocation. For these allocations it therefore means negotiating on phasing with these lead developers.</p> <p>1.3 Grange is more difficult owing to the fact that there are 4 land owners involved across 5 different parcels of land (including Percy Wakley woods owned by the Woodland Trust). However key infrastructure has been kept away from the Grange allocation - it is both the smallest allocation and therefore the least able to support larger land takes associated with the onsite infrastructure, and the most fragmented in terms of ownership, meaning that co-ordinated delivery could prove more challenging.</p>	<p><b>Q118 - Justified and effective phasing/ co-ordinated approach to delivery</b></p>

1.4 For any of the four allocations however there are some basic requirements that need to be adhered to, and the framework for these are set out in Policy CB7. The Policy addresses in detail SANGS and education provision, as well as the undergrounding of the Overhead line which affects Cobdens and Grange. It is similarly expected that infrastructure associated with transport and Green infrastructure set out elsewhere within the Plan will be captured by any phasing agreement.

1.5 Policy CB7 sets out the expectation as to how each expansion area will be developed but it also recognises that there will be important factors that will affect this – not least the build out rate/route and the affect that this will have on viability and cash flow.

1.6 The greatest risk to infrastructure delivery and the coordination between allocations, is that one or more of them are not brought forward by a respective developer. This is always a risk with any comprehensive development plan and has been considered in this instance. While there will always be a risk, the plans tries to minimise this by placing strategic infrastructure on the allocations with greatest certainty of being delivered ie where conversations have been significantly advanced with particular developers. In Grange where conversations are at their earliest stages/have yet to start there is no strategic on site infrastructure requirement. This approach should make development of these smaller sub phases easier to bring forward, reduces the risk to key components but also helps to ensure that the housing trajectory continues to be met.

1.7 **Does the policy rely on multiple landowners reaching agreement? How might uncertainty for owners particularly for smaller land holdings be avoided?**

1.8 Currently the Policy does require a comprehensive phasing plan (CPS) for each allocation in full and as a result for different land owners to reach agreement. However it is recognised that this approach carries with it inherent risk of delay to the whole allocation – not something that the Council wish to occur or for that matter many of the developers.

1.9 It has already been set out within the response to Q118 that three of the allocations have lead developers who own or control all or most of the respective allocation. In addition the fourth expansion allocation (Grange) does not carry strategic on site infrastructure. To put in place an arbitrary threshold above which a CPS is required is cumbersome unwieldy and risks, if desired, being deliberately circumvented. Therefore a solution to address this concern which has been raised by a number of developers is to make a modification to the first paragraph of Policy CB7 by inserting/amending the text as follows:

...must be carried out in accordance with an approved comprehensive phasing strategy ~~for each~~ **which addresses the area of land under control in full and demonstrates its integration with the respective expansion area.**

1.10 Such an approach addresses the concerns of the large scale developers but also allows smaller land holdings to be brought forward for development without being dependent on the larger developers.

**Q119 -  
Reliance on  
multiple  
landowners  
reaching  
agreement**

<p>1.11 <b>Can improved clarity be given to those instances where delivery means making serviced land available and where it means providing buildings?</b></p> <p>1.12 Currently it is considered that there is clarity in the requirements derived from the Infrastructure Delivery Plan and Policies CB2-5; 6 and 7 when taken together – eg Policy CB3 paragraph 2.a) requires only the provision of serviced land capable of accommodating a community building. All other requirements identified relate to built form. However if further clarity can be suggested the Council will happily consider such a proposal.</p>	<p><b>Q120 - Improved clarity to delivery of serviced land available or buildings</b></p>
<p>1.13 <b>How have the occupation restrictions been validated and how might interim solutions enable the release of funds to deliver the infrastructure?</b></p> <p>1.14 The occupation restrictions highlighted within Policy CB7 (phasing) focus on SANGS delivery and that relating to education. In terms of SANGS the requirement for delivery ahead of housing is well documented and explored in more detail through our responses to Q123, as well as Q194 and those following.</p> <p>1.15 In terms of schools there are two key triggers – that at 30 dwellings and that at either 1650 or 2500 depending on which size of school is brought forward first. These triggers have been identified by Devon County Council.</p> <p>1.16 The need for the first school by 30 new dwellings i.e. a total at Cranbrook of 3530 is derived from the Devon County Education Infrastructure plan <a href="https://democracy.devon.gov.uk/documents/s4745/EI%20Draft%20Plan.pdf">https://democracy.devon.gov.uk/documents/s4745/EI%20Draft%20Plan.pdf</a> which recognises that for family sized accommodation (2 bed dwellings and</p>	<p><b>Q121 - Occupation restrictions and release of funds for infrastructure</b></p>

upwards there is a typical pupil generation of 0.25 4-11 year olds. While there is a small percentage of flats within Cranbrook that could distort the simple maths essentially the following equation follows:

3500	x 0.25	= 875
(total for phase 1)	(primary aged pupils per dwelling)	primary places (total)

- 1.17 Across 7 years of primary education (reception to Year 6 incl.) this equates to 125 pupils admissions per year and therefore just above 4 form entries where there are 30 places per form per year. Both Cranbrook education Campus (primary) and St Martins Primary have a pupil admissions number of 60 (totalling 120) and therefore demonstrating that for the expansion area additional school capacity will be needed. This picture is particularly stark recognising the demographics in the town are currently skewed to a younger population and therefore while these may balance in time pupil numbers are higher than the evidence base would suggest would normally be the case.
- 1.18 Devon County Council have indicated that elsewhere in the County they have agreed to provision of temporary classrooms/schools where a new permanent school will be built but is not yet available. Provided the gap between temporary and permanent provision is kept small, it is an option that is worth exploring with the County to understand if this could help with infrastructure delivery and associated cash flow.



- 1.19 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?
- 1.20 The inconsistency between paragraphs 3.6 and 3.14 is a product of the evolving nature of the two applications that have previously been made for the respective expansion areas – namely Treasbeare and Bluehayes. As set out within the housing trajectory we now consider that Treasbeare will come forward ahead of Bluehayes recognising the commitments of the known developers elsewhere within the Cranbrook development as a whole

**Q122 - Clarification for the rationale for the phasing of the expansion areas CB2 to CB5**

Table 6.5 Cranbrook housing trajectory

Area	Year													Totals
	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9	Yr 10	Yr 11	Yr 12	Yr 13	
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	
<b>03/P1900</b>	150	300	400	400	400	94								<b>1744</b>
<b>Bluehayes</b>						50	150	150	150	150	150	150	27	<b>977</b>
<b>Treasbeare</b>				12	100	150	150	150	150	150	48	4		<b>914</b>
<b>Cobdens</b>			20	80	125	175	175	175	175	175	130	130	131	<b>1491</b>
<b>Grange</b>				12	55	110	110	110	110	110	110	53	8	<b>788</b>
<i>Extension areas</i>	0	0	20	104	280	485	585	585	585	585	438	337	166	<b>4170</b>
<b>Total</b>	<b>150</b>	<b>300</b>	<b>420</b>	<b>504</b>	<b>680</b>	<b>579</b>	<b>585</b>	<b>585</b>	<b>585</b>	<b>585</b>	<b>438</b>	<b>337</b>	<b>166</b>	<b>5914</b>

- 1.21 Irrespective of this assessment however we have placed the proposed two form entry primary school in the expansion area where the Council consider, in sustainability terms and for place making, a school is best located – that being Treasbeare. However it is also recognised that this is not an exact science and therefore provision has also been made for a school in Bluehayes should the need arise although this is not the Councils preferred location

<p>Subject to the resolution of the school place provision, and in this regard both the potential for temporary classroom provision needs to be explored as well as the overlap in housing delivery between the consented Cranbrook Phase 1 and expansion development, it is anticipated that development at Cobdens (through the Farlands development) would commence first. This would be closely followed by development at Treasbeare and the first of the Grange parcels demonstrating the Councils belief that with different developers and different parts of the market being targeted it is possible to get a number of the expansion areas underway at the same time to ensure prompt housing delivery.</p>	
<p>1.22 <b>How will SANGS be delivered ahead of new housing?</b></p> <p>1.23 Discussions with Natural England around phasing highlighted their preference for the supporting text to Policy CB15 to explicitly state that SANGS should be in place before recreational impacts occur. The Statement of Common Ground agreed with Natural England shows an amendment of paragraph 3.53 to read:</p> <p>1.24 ‘Set out in more detail in Policy CB15 and the associated supporting text, it is critical to the phasing of development that SANGS is delivered in a timely fashion <b>and must be in place and be of a suitable quality before first occupation of dwellings in each phase or sub phase to ensure they are in place before recreational impacts occur</b>’.</p> <p>1.25 This change ensures that sufficient SANGS will be delivered in advance of potential recreational impact.</p>	<p><b>Q123 - Ensuring SANGS delivery ahead of new housing</b></p>

<p>1.26 <b>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?</b></p> <p>1.27 The Council is clear in expressing our wish to locate a new primary school on the Treasbeare expansion area rather than the Bluehayes expansion area. However we did not wish to unduly fetter development and therefore considered that an option was appropriate in this instance. In terms of giving certainty to landowners and developers, the expectation is that by using the IDP and taking into account both the school's delivery and land costs as well as the resulting change in housing numbers between the two allocations the same total costs fall to be borne by both developers. Effectively this would necessitate two versions of the equalisation appendix set out in the Cranbrook IDP.</p>	<p><b>Q124 - Clarity for land-owners and infrastructure on Primary School location</b></p>
<p>1.28 <b>Are any Main Modifications proposed in relation to Issue 11?</b></p> <p>1.29 Noting the answers provided above there are two modifications that if the Inspector is so minded are proposed in respect of phasing. These comprise the following:</p> <p><b>1. Policy CB7 (Phasing) First paragraph</b></p> <p>...must be carried out in accordance with an approved comprehensive phasing strategy <del>for each</del> <b>which addresses the area of land under control in full and demonstrates its integration with the respective expansion area.</b></p> <p><b>2. Supporting text to Policy CB7 - paragraph 3.53 to read:</b></p>	<p><b>AQ11 - Main modifications proposed</b></p>

---

Set out in more detail in Policy CB15 and the associated supporting text, it is critical to the phasing of development that SANGS is delivered in a timely fashion **and must be in place and be of a suitable quality before first occupation of dwellings in each phase or sub phase to ensure they are in place before recreational impacts occur**

# Appendices

**Appendix 1: There are no appendices attached to this statement**