

Cranbrook Plan 2013-2031 Examination

Matter 9: Infrastructure Delivery
29th January 2020

Devon County Council Position Statement

Statement Prepared 8th January 2020

Devon County Council
County Hall
Topsham Road
Exeter
Devon
EX2 4QD



1. Introduction

1.1. Purpose of this statement

- 1.1.1. This statement has been prepared to answer questions and address the associated issues as posed by the Planning Inspector in relation to matter 9 (infrastructure delivery) for the Independent Examination of the Cranbrook Plan 2013-2031.
- 1.1.2. 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, Local Education Authority and Lead Local Flood Authority).

1.2. Summary of DCC approach and position

- 1.2.1. 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. **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?**

- 2.1.1. There is an established approach for securing the funding to support the infrastructure required for the first phases of Cranbrook which are currently coming forward. This relies on a complex series of S106 agreements to ensure appropriate funding and/or delivery of key infrastructure. Through the emerging revisions to the East Devon CIL charging schedule, the general approach of securing funding for infrastructure delivery through S106 is now extending to the expansion areas. This approach is supported by the County Council as it more appropriately ties the availability of infrastructure funding to the build-out of development at Cranbrook itself.
- 2.1.2. The approach to education infrastructure provision and delivery in the Cranbrook Plan is based upon the County Council's Education Infrastructure Plan¹. This approach seeks to ensure statutory responsibilities with regard to pupil places are met. As this is a statutory requirement it is a necessary

¹ Devon County Council's Education Infrastructure Plan (revised) 2016 – 2033 is available at <https://www.devon.gov.uk/planning/planning-policies/pupil-place-planning>

and non-negotiable requirement of the Plan. Despite this, there can be flexibility in the way in which provision is delivered and Devon County Council will work closely with East Devon District Council and the developers to secure the best outcome. There is a strong track record in Cranbrook for the delivery of education infrastructure.

- 2.1.3. DCC reiterates comment 19 of its Submission Draft consultation response to update the rating of primary school (630 place) in Appendix 1 of the Cranbrook Infrastructure Delivery Plan to “critical”. This is required in order to be consistent with the priority rating given in paragraph 2.3 and in Appendix 2 (item 24). Note this is not considered to be a soundness issue but rather a minor update to ensure consistency.
- 2.1.4. We also reiterate comment 30 of our Submission Draft consultation response. DCC considers the provision of SEN places as equally significant to mainstream primary and secondary places. As such funding towards its provision should be treated with the same weight.
- 2.1.5. Please also see comments 15, 16, 17, 21, 23, 26, 27 and 28 of the DCC’s consultation response to the Submission Draft relating to the priority categorisation of transport infrastructure.
- 2.1.6. Other infrastructure items relevant to County Council services categorised as ‘important’ are the fit-out costs for the library, children’s centre and youth services. The extra care housing contribution is categorised as ‘desirable’. DCC reiterates previous comments in our covering letter for our consultation response to the Submission Draft. In particular, the County Council remains concerned that the priority definitions in Table 1 of the Cranbrook Infrastructure Delivery Plan do not allow for clear prioritisation of all the infrastructure that is vital at Cranbrook due to combining two potentially inconsistent elements relating to the importance of the infrastructure and the timescale for delivery. How important the item is should take precedence over the delivery timescale when assigning items to a priority category. The County believes the infrastructure it has identified as necessary should be funded from the requested s106 contributions even if the timescale is less critical and it is currently identified as category 2 or 3.

3. Q130: Is Policy CB6 justified and effective? Are the infrastructure requirements consistent with national policy?

- 3.1.1. Devon County Council understands the general logic for the approach to infrastructure delivery proposed in Policy CB6 and acknowledges the categorisation of infrastructure projects in Appendix 1 of the Cranbrook Infrastructure Delivery Plan. The approach seeks to achieve an equalisation of costs so infrastructure delivery is achieved in a fair and coordinated way across the whole development. The approach is supported providing it can effectively deliver the necessary infrastructure in a timely manner and provides s106 funding for necessary Category 2 and 3 infrastructure (as per our comments for Q126).

3.1.2. If this policy approach is not adopted or cannot achieve timely delivery of infrastructure, notably education provision, Devon County Council would seek to return to the usual approach adopted in S106 negotiations, which is that of developers making a proportionate contribution to infrastructure in accordance with Devon County Council's Education Infrastructure Plan. The CIL zero rating of Cranbrook will ensure there remains a flexible approach to delivering infrastructure.

4. 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?

4.1.1. Devon County Council is working with partners to ensure timely delivery of town centre facilities which are required under the existing s106 agreement. In particular, the Council is proposing to deliver a community building which would combine the library, youth and children's centre facilities by or in advance of the timescales identified in the s106 agreement. Further comments are provided under matter 18 question 221.

5. 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 Whimble Primary School)?

5.1.1. The trigger for the new primary school is very early on within the development phasing and therefore only a small number of additional pupils will be generated from the development before the school opens.

5.1.2. There will be an opportunity to provide temporary accommodation in advance of the permanent new school buildings opening and this is an approach which has been followed recently at a number of new primary school across the county, including Monkerton (in Exeter) and Kingsteignton. This approach can be followed when there is certainty that the new school will open within a reasonable timeframe. There is extensive land available at the Cranbrook Education Campus and as such there is potential that such a solution could be provided there.

5.1.3. Whimble Primary School has a Published Admission Number (PAN) of 20. However future known cohorts of children living with the school catchment area are around 12 (60% of PAN) and as such there is some spare capacity at the school should parents decide to choose this school.