

The Cranbrook Plan: Examination

Matter 10: Specific Policies

Statement on Behalf of East Devon New Community
partners

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?

1. The Built-Up boundaries on the Policies Map are just one of a number of designations included on the Policies Map. There are the Expansion Area boundaries (one for each of the four expansion areas). There is a Cranbrook Plan Area boundary. There are allocations boundaries - largely co-terminus with the expansion area boundaries. The built up boundary is more tightly drawn within each expansion area and also around the approved development of Cranbrook.
2. EDNCp have made representations objecting fundamentally to the employment of built up area boundaries. These are further articulated in relation to Matter 9. EDNCp consider that the Built-up Areas of Cranbrook are not positively prepared nor justified. Nor are they necessary.
3. Fundamentally there is no evidence base that justifies the specific location of the Built up Boundaries imposed in the DPD. They are taken from the Cranbrook Masterplan documents although all of the documentation relating to the DPD is clear that the Cranbrook Masterplan document is not part of the DPD and is for illustrative purposes only. It cannot be a detailed master plan as it fails to reflect site specific information and technical studies (unlike for instance the submitted planning application).
4. One consequence of the Built up Area boundaries within the Bluehayes area is the potential constraint placed on some 3 hectares or more of potential residential development – for no sound reason (the drainage basin being proposed in its place being inconsistent with sustainability principles and the technical study of drainage options that accompanies the Bluehayes planning application). The Built up boundaries as proposed may preclude the delivery of the capacity required in policies CB2-5 of the DPD and will undermine the viability assumptions – for no evidenced reason.
5. There is no reason not to rely simply on the allocation boundaries in a manner consistent with the East Devon Local Plan. This would be radical change in effect for the allocation boundaries in the EDLP for Bluehayes and The Cobdens.
6. The Sustainability Appraisal of Policy CB8 acknowledges that there are alternative approaches available and the fact that the boundaries that are drawn “comparatively tightly around existing and planned development”. One of the alternative approaches would be not have built up area boundaries and rely instead on the allocation boundaries (or presumably the expansion area boundaries). No particular sustainability benefits were identified from either the present or the alternative approach.
7. Part of the rationale for having a Built-Up area boundary is that Cranbrook is now developed enough to have its own boundaries. But of course, less than half is approved. The majority is yet to gain permission. So where do you put Built-up boundaries. In answer to this question, what EDDC has done is propose Built-Up Area boundaries on where it thinks that the edge of the residential built-up area would go in the expansion areas. The only basis that it has for this is to

draw a line around what might be seen to be the edge of development described in the Cranbrook Masterplan (February 2019).

8. Although included in in the DPD as Figure 8 The Cranbrook Masterplan document is simply described in its para 1.1 as forming part of the evidence base for the DPD. It is not at any point presented as the policy of the DPD. The position is made very clear in the Cranbrook Plan Sustainability Appraisal (Publication Draft (Feb 2019: Written by EDDC officers (para 1.1); para 6.1 refers to the appraisal of the 2019 Masterplan evidence: *“It is reiterated that the Masterplan is not part of the DPD, it is evidence that has informed the DPD...”*
9. To paraphrase the Masterplan shows how Cranbrook expansion could take place but does not say that that is how it will, or must.
10. Yet the Built-up Area Boundaries are drawn in a very precise manner, seemingly based upon it. as such they constrain the ability for the detailed master planning associated with design codes or application to identify a more sustainable outcome or indeed simply to reflect a more detailed understanding of opportunities or constraints.

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

11. Absolutely not – see answer to Q134.

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

12. For all the reasons set out above the following modifications are proposed
 - any reference to Built-up areas be deleted from the wording of CB8;
 - the designation of Built-up areas be deleted from the Policies Map with reliance placed instead on allocation boundaries insofar as any boundaries are necessary (as mooted in the Sustainability Appraisal);
 - the inclusion in the plan - for absolute clarity the reference from the SA -*“It is reiterated that the Masterplan is not part of the DPD, it is evidence that has informed the DPD...”*

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?

13. CB9 states that *“development proposals brought forward within the Cranbrook Plan Area shall contribute proportionately to the cost of the necessary infrastructure to facilitate these public transport enhancements in accordance with Policy CB6”*.
14. The formulation of Policy CB9 and the supporting text appears to indicate a requirement for **both** the enhancement of bus-based services and of rail based services.
15. It is the policy in relation to rail based services that is not sound.

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16. In this regard it is unclear what is being sought - “provision for an enhanced frequency of services” or to whom it is being directed.
 17. What is apparent from the IDP and the supporting document that outlines the County Council Section 106 expectations, is that the expansion areas are expected to pay a very substantial sum towards public transport improvements: £8,380,000. This is in addition to £3million of infrastructure in relation to cycling and walking.
 18. Appendix 2 of the IDP does not identify the proportion of those costs that relate to the provision of additional rail services but it is clear that the majority relates to the rail rather than the bus facilities or services.
 19. The justification for the additional “provision for rail services” is largely absent. In the introduction to the evidence document setting out the County Council Transport requirements, the position is explained. It advises that the transport infrastructure already invested by the Highway Authorities and by the Cranbrook and other developers - which has been considerable with the Clyst Honiton Bypass, Junction 29 improvements, Tithe Barn link and A30 junction - have secured the capacity for at least 6000 dwellings to be constructed at Cranbrook without further need for transport interventions.
 20. Such interventions are listed as travel plan, walking and cycling as well as public transport (of which bus and rail are options). There are various options which do not require provision of new rail services. New rail services are not necessary. There are perfectly appropriate alternatives.
 21. Part of the justification in the plan, in para 3.59, is that this is part of the vision for the transport system in the LTP. That being the case then the justification is based less on the specific needs of Cranbrook expansion.
 22. Further information on the improvement of rail services is set out in para 2.18 of the Cranbrook IDP. Here the second rail station is identified a Priority Two infrastructure priority which seems to contradict the setting out of a policy to deliver a second station and rail based service improvements.
 23. As to the likelihood of a station being provided and the ability to enhance services, there can be little or no certainty attached to this prospect. While provided for in the LTP this does not constitute even the rather lukewarm “reasonable certainty of progressing” cited in para 3.64 of the DPD Publication Draft. In reality a very dramatic scale of investment is likely to be required to secure additional capacity on the major rail line itself and the provision of a passing loop to have any prospect of a second station or the enhanced services that flow from it. The likely costs of such works is said to be £50m in the Cranbrook IDP (para 2.18).
 24. Detailed evidence has been submitted in relation to Policies CB6 and CB11 relating to the cost and viability of the development proposed in the DPD and the lack of affordability of the DPD’s provisions.
 25. The major expenditure on sought for rail based services and second station - to serve only a small part of the expanded Cranbrook is neither justified nor effective and contributes through a policy status to the undermining of the viability of the expansion proposals.

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26. It is also noted that the total sum requested from Cranbrook expansion areas by Devon County Council towards transport s.106 contributions has already been increased from £8.38m to £8.97m to accommodate EVC policy requirements. Equally EDNCp have requested information on the breakdown of these costs to determine if they are appropriate reasonable or proportionate. Such information has not yet been provided.

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

27. For all the reasons set out above, and in the absence of any further clarification, it is proposed that the policy for enhanced rail based services should be deleted from the DPD (Policy CB9).

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?

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

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