

Statement for the examination of the Cranbrook DPD

Response to the Inspectors Matters Issues and
Questions

Matter 13: Phasing proposals

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

eastdevon.gov.uk

[@eastdevon](#)

Contents

Issue 19: Are the Infrastructure Phasing Proposals through Policy CB7 positively prepared, justified and effective?	4
Q152 – Key Infrastructure	4
Q153 – Infrastructure funding	5
Q154 – Infrastructure Delivery Plan	6
Q155 – Expansion areas phasing	7
Q156 – School provision and delivery	7
Q157 – School phasing rationale	9
Q158 – Primary school completion	9
Q159 – Additional station funding	10
Q160 – Power, water and storage capacity	10
Q161 – Power line under grounding	11
Q162 – Train loop delivery	12
AQ19 – Main modification	12
Appendices	13
Appendix 1: Preferred approach response from National Grid	13
Appendix 2: Preferred approach response from South West Water	13

Issue 19: Are the Infrastructure Phasing Proposals through Policy CB7 positively prepared, justified and effective?

Response	Inspectors Question(s)
<p>1.1 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?</p> <p>1.2 The phasing requirements of key infrastructure is clear and precise where the infrastructure is time critical. In this regard Policy CB7 is prescriptive towards the timing and delivery of schools and SANGS. Beyond this, the Policy requires a phasing strategy to be submitted for each expansion area setting out how other requirements (social community and physical facilities and infrastructure) will be required alongside or ahead of new housing. The Council recognise that cash flow with any development is a key determinant and therefore seek to work with developers to deliver a phasing strategy that works for all – whilst recognising the policy premise of early delivery.</p> <p>1.3 In terms of Cranbrook Phase 1, infrastructure delivery has been somewhat different owing to fact that it has and continues to be built out by a consortium of developers. In this regard costs and cash flow has been managed internally between the developers and there has been no need for the Council to be directly involved in organising how costs are shared.</p>	<p>Q152 – Key Infrastructure</p>

<p>1.4 Notwithstanding the shift in approach by the developers, the model of early delivery of key infrastructure – most particularly the school and first railway station within Cranbrook Phase 1 that has set the tone for the phasing Policy CB7. For Cranbrook Phase 1, St Martins Primary school was opened in September 2012 as a result of collaboration between Local government and the development consortium. The delivery of the school under this model has proved to be highly successful and gives credibility to the early delivery being sought within Cranbrook Phase 2.</p>	
<p>1.5 How does the approach to infrastructure funding influence the phasing of the four expansion areas?</p> <p>1.6 There is only limited influence and impact between the approach to infrastructure funding and phasing of the four expansion areas. Key on site infrastructure has been located where it will best serve the community maximising the approach towards sustainability and the walkable neighbourhoods while also ensuring the facilities are collocated to support each other, seeking to ensure that one provided they have a robust financially sustainable future.</p> <p>1.7 Determinant to the start of housing development is limited to SANGS and schools. SANGS is identified in each of the four expansion areas and therefore can be brought forward by most developers as it is under their own control.</p> <p>1.8 Schools are more of a challenge with only two of the expansion areas having permanent school buildings. However these are split east and west of the town and provision can be made on either Bluehayes or Treasbeare (noting the Council's preference for a site in Treasbeare).</p>	<p>Q153 – Infrastructure funding</p>

<p>1.9 This distribution, coupled with the potential for temporary school buildings to accommodate pupils who are initially generated by the expansion areas allows any of the expansion areas to be started first (noting the Councils expectation that it is more likely to be one of Bluehayes, Treasbeare and Cobdens rather than Grange).</p> <p>1.10 Importantly there has been an attempt to prevent the expansion areas, where possible, being beholden on one or other of the areas. Such a restriction is unhelpful in giving confidence to developers and risks the delivery trajectory that the Council is working towards.</p>	
<p>1.11 How does Policy CB7 align to the Infrastructure Delivery Plan?</p> <p>1.12 Policy CB7 places a requirement on developers to deliver a phasing strategy demonstrating how social community and physical infrastructure including SANGS and employment land and premises is delivered alongside or ahead of new housing. Such a strategy needs to recognise the allocation requirements set out in Policies CB2 - 5 inclusive and Policy CB6 (Cranbrook Infrastructure Delivery).</p> <p>1.13 The Infrastructure Delivery Plan underpins Policy CB6 and therefore it is considered that it would need to be considered when writing the strategy – not least because it sets the expected value of infrastructure components which directly affects cash flow and the subsequent phasing. It will need careful triangulation between these sources but it is considered that they should all align.</p>	<p>Q154 – Infrastructure Delivery Plan</p>

<p>1.14 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?</p> <p>1.15 A phasing strategy provides the ability for a clear up front understanding of the infrastructure components that are required on a particular development site and the timing by which they are delivered. Such a strategy would ultimately need to feed into the Section 106 agreement for the particular expansion area (or part thereof) in the form of defined triggers. However to have such a document ahead of determining an application is valuable in allowing both the Council and other consultees to understand the sequence and timing for future delivery. Irrespective of the size of land control or how fragmented the various expansions areas are, such a strategy is considered important.</p> <p>1.16 Within the Policy, the requirement is for such a document to be agreed before planning permission is approved. This approach is essentially right as it assumes that such a strategy would be submitted with the application and considered as part of the application - ultimately being agreed when the Council resolve to grant outline planning permission. The agreed approach can then be encapsulated into the Section 106 agreement which needs to be signed before permission is finally issued.</p>	<p>Q155 – Expansion areas phasing</p>
<p>1.17 There is a time critical relationship referred to between school provision and funding via housing; how realistic is the delivery of the school?</p> <p>1.18 Early delivery of the first school is one of the most challenging components of the infrastructure delivery recognised within the Plan but such provision has been achieved before in Cranbrook. St Martins</p>	<p>Q156 – School provision and delivery</p>

Primary was delivered at around 30 dwelling in 2012 following successful involvement of the then RDA. It proved a catalyst for community development and an important focus for the town. While the RDA no longer exists the model demonstrates what can be achieved.

- 1.19 Essentially delivery requires a close working relationship between developer and the local Authority and there is already a willingness by Devon County Council to engage with developers and explore available options.
- 1.20 While the Local Education Authority have indicated their willingness to explore temporary classrooms, the preferred route to early delivery will either through direct developer funding or through the drawing down of a government loan which is available to developers where they need to deliver a new school. The “Developer Loan for Schools Programme” is currently running between 2019 and 2021 in areas that meet criteria including:
- A demand for more good school places
 - An approved application to open a new free school before the loan changes hands
 - Planning permission to build extra homes
 - Demonstrable value for money of the project
 - Early funding required for the school as part of housing developments; and
 - The borrower must be a UK-registered company and must own the site.
- 1.21 It is hoped that this programme might be of benefit to Cranbrook developers but is just one of a number of mechanisms open to developers to meet the identified need.
-

<p>1.22 Phasing of the school by the 30th Dwelling inextricably links the four expansion areas; what is the rationale behind this approach?</p> <p>1.23 The need for a new school arises from the fact that the two Primary schools now open in Cranbrook are set to be full by 3,500 dwellings. With insufficient capacity in either of the two Cranbrook schools and a lack of capacity in existing Primary schools surrounding the town, a new school is required. While different funding regimes and interim delivery measures may be explored, there is simply a need for a new school early within the delivery of the expansion phases for Cranbrook.</p>	<p>Q157 – School phasing rationale</p>
<p>1.24 Should the primary school be completed prior to the first occupation of any new dwellings in these four expansion areas?</p> <p>1.25 Policy CB7 recognises evidence previously provided by Devon County Council which sets out that by the time 3,500 house are built at Cranbrook the two existing Primary School in Cranbrook will be full. Based on this response, the evidence of school capacity and the young demographics that the town demonstrates, early delivery of a new school is required.</p> <p>1.26 Whether the trigger should be a 1 dwelling or 30 makes little difference as the start-up costs associated with opening up a new outlet would require for most medium and large scale developers, a greater output than just 29 units. Essentially this represents an upfront trigger whilst still allowing for the ability to put in roads and servicing for both the housing and new schools at the same time.</p>	<p>Q158 – Primary school completion</p>

<p>1.27 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?</p> <p>1.28 An additional station would be funded from the S106 transport contribution, either as a component towards a wider package of rail enhancements or a standalone scheme. Should costs increase through detailed design, then the County would need to secure additional funding, using either its Local Transport Plan budget or external funding bids to Department for Transport</p> <p>1.29 Were a second station not to be feasible and noting the potential uncertainty on timing and provision for such development, there would need to be a more ambitious public transport solution. Potential options would evolve over time and the County Council’s S106 request is proposed for public transport for the area, to give some flexibility as future changes take place.</p> <p>1.30 The allocation of the Cobdens expansion area remains a robust allocation noting that this already allocated for such development within the Local Plan which was found sound and ultimately adopted in 2016 without a station safeguarding policy in place.</p>	<p>Q159 – Additional station funding</p>
<p>1.31 Is it certain that power, water and sewage capacity can be fulfilled for all the additional development expected within the expansion areas?</p> <p>1.32 Both South West Water and the National Grid commented at the preferred approach stage of the plan preparation and neither sought to</p>	<p>Q160 – Power, water and storage capacity</p>

<p>raise objections. Their comments which recognise the scale of development are attached as appendices to this statement.</p>	
<p>1.33 If power lines cannot be placed underground, how might this affect the delivery of the Cobden’s allocation?</p> <p>1.34 The 2017 and 2018 reports from Ben Tibbets (Cran024 and 031) demonstrate the viability and cost effectiveness of undergrounding the 132kV line that crosses the Cobdens and Grange expansion areas through the release of land for development and for use as SANGS.</p> <p>1.35 If this line were not to be undergrounded it would result in housing numbers only being achieved through a highly fragmented development pattern in the Cobdens area which would result in the overall area being much less sustainable through increases in journey times to necessary social and community infrastructure, while also increasing the cost of servicing the dispersed houses.</p> <p>1.36 In addition, the existing pylons are a significant visual intrusion within the landscape, reducing the ability of the areas within the control of developers from providing an effective or desirable SANGS service to residents. As a result there would be a risk that developers at Cranbrook would be obliged to purchase additional land around Cranbrook to provide suitable areas for SANGS, thereby increasing costs and potentially undermining the viability of development in the Cobdens and Grange areas.</p>	<p>Q161 – Power line under grounding</p>

<p>1.37 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?</p> <p>1.38 Based on Devon County Councils Section 106 request for transport document in June 2018 (Cran028), it was set out that a train loop that enabled a half hourly frequency service to Axminster is expected to remove 240 peak hour car trips. The County Council advise that of these it is expected that 80% of trips are heading into Exeter, and therefore a train loop would reduce traffic into Exeter by 190 car trips.</p> <p>1.39 It is expected that the train loop would be delivered as part of a strategic rail enhancement program and to this end, a “Waterloo to Exeter” study is currently being undertaken (expected completion Summer 2020). The findings of that report will identify a series of infrastructure improvements which are likely to be delivered as a rolling program in the next Control Period (2024-2029). The existing Barnstaple to Exeter Service (which as of December 2019 terminates in Exeter) could then be extended to Axminster with one additional unit helping to facilitate an enhanced service. Ultimately funding for such a large scale strategic infrastructure project is beyond the scope of the expansion proposed for Cranbrook and is therefore dependent upon a successful bid to Central Government.</p>	<p>Q162 – Train loop delivery</p>
<p>1.40 Additional Question: Are any Main Modifications proposed in relation to Issue 19?</p> <p>1.41 No</p>	<p>AQ19 – Main modification</p>

Appendices

Appendix 1: Preferred approach response from National Grid

Appendix 2: Preferred approach response from South West Water

Thea Billeter

From: Developer Services Planning <DeveloperServicesPlanning@southwestwater.co.uk>
Sent: 14 November 2017 16:00
To: Plan Cranbrook - DPD consultation
Subject: RE: Cranbrook Plan – Preferred Approach

Thank you for providing details of the above we are already aware of these further extensions to Cranbrook and have no specific comments at this time.

Regards

Martyn Dunn Development Coordinator



South West Water

D: 01392 443702

Peninsula House, Rydon Lane, Exeter, EX2 7HR
www.southwestwater.co.uk

Please note that the Water Act 2014 has brought in changes that mean that all water companies are being asked to modify the way they [charge customers for Developer Services related activities from April 2018](#).



From: Plan Cranbrook - DPD consultation [mailto:PlanCranbrook@eastdevon.gov.uk]
Sent: 10 November 2017 14:07
Subject: Cranbrook Plan – Preferred Approach

Dear Sir/Madam

Cranbrook Plan – Preferred Approach

We are delighted to advise that East Devon District Council are consulting on the above plan and we would welcome your comments that need to be received by us by 9:00 am on Monday 8 January 2018.

The Cranbrook Plan Preferred Approach documents set out proposals for the future development of the town and they include a masterplan that shows the proposed location of differing types of buildings and land uses including homes, shops, community facilities and open spaces. In the consultation documents we provide details of evidence and background reports that support the Cranbrook work and we also have a schedule of potential future policies for Cranbrook development and a sustainability appraisal.

The feedback we receive from this consultation will help inform production of a formal development plan document (or DPD) for the town that we hope to produce and consult on in 2018 and then to formally submit for independent

examination. You can find out more about the Cranbrook Plan – Preferred Approach, look at supporting documents and find out how to make comments by visiting our web site at:

<http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-preferred-approach-consultation>
and
<http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/get-involved-share-your-views>

Do please contact us if you have any queries or would like further information. We would advise that we are contacting you because your details are logged on our planning policy database or you have previously responded to Cranbrook consultation events. If, however, you no longer wish to be contacted by this Council in respect of planning policy documents do please advise us and we will remove your details from our database.

Yours faithfully
The Cranbrook Team
East Devon District Council

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South West Water Limited - Registered in England No: 2366665

Registered Office:

Peninsula House

Rydon Lane

Exeter

Devon EX2 7HR

13 November 2017

Dear Sir / Madam

**East Devon District Council: Cranbrook Development Plan
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Hannah Lorna Bevins
Consultant Town Planner

n.grid@amecfw.com

Amec Foster Wheeler E&I UK
Gables House
Kenilworth Road
Leamington Spa
CV32 6JX

Spencer Jefferies
Development Liaison Officer, National Grid

box.landandacquisitions@nationalgrid.com

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Yours faithfully

[via email]

**Hannah Lorna Bevins
Consultant Town Planner**

cc. Spencer Jefferies, National Grid