

Statement for the examination of the Cranbrook DPD

Response to the Inspectors Matters Issues and Questions.

Matter 17: Development Management Policies

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Issue 26: Design Codes

	Response	Inspectors Question(s)
1.1	<p>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?</p>	<p>Q203 – Flexibility with changing conditions</p>
1.2	<p>By allowing design codes to be agreed for phases of development the policy allows flexibility to address changes and issues that occur between phases within a design framework provided for the expansion area as a whole and the Masterplan for Cranbrook which provides a robust and evidenced structure to future development at Cranbrook.</p>	
1.3	<p>The Masterplan provides a well evidenced and robust approach to the expansion of Cranbrook. The structure and layout provides a sustainable and navigable approach to development within which there is still considerable freedom to include a wide range of design expression and styles. It is expected that the masterplan framework is adhered to unless substantive evidence to deviate from it is provided. The wording of Policy CB16 makes this clear by requiring the design codes to “.....demonstrate how they have regard to the layout of development indicated in the Masterplan....”.</p>	

1.4	<p>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?</p>	<p>Q204 – Well designed places</p>
1.5	<p>The Planning Policy Guidance and the linked National Design Guide highlight ten components of good design: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan. These components are very similar to those listed in Policy CB16 and are based on the good design principles within the existing and well regarded Building For Life criteria which have been used to good effect at Cranbrook so far. The guidance refers to the use of non-strategic policies to “...establish more local and/or detailed design principles for an area, including design requirements for site specific allocations” which will be established in due course based on the requirements of policy CB16 and the evidence of the masterplan and other supporting documents.</p>	
1.6	<p>Should the policy make clear whether the design codes are required at outline or detailed planning application stage or in advance of either?</p>	<p>Q205 – Clarity at outline or detailed permission</p>
1.7	<p>The first sentence in the policy clearly states these shall be developed in advance of the detailed applications. We would encourage developers to work with us in advance of the submission of detailed applications to develop the design codes and work up detailed proposals based on them.</p>	

1.8	What is the justification for the reference to the Masterplan in policy CB16?	Q206 – Masterplan justification
1.9	The masterplan sets out the general design principles and standards that development proposals should follow in the area of Cranbrook. It indicates the intended arrangement of the streets and buildings. It is intended that the design codes will provide more specific parameters that shows how the development comes forward within the pattern of development contained within the Masterplan.	
1.10	Are any Main Modifications proposed in relation to Issue 26?	AQ27 – Main modification
1.11	No.	

Issue 27: Amenity

	Response	Inspectors Question(s)
2.1	<p>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?</p>	<p>Q207 – Development close to airport</p>
2.2	<p>CB17 assists in securing amenity for residents as it strengthens the policy requirements of CB3 that requires that applicants demonstrate that adequate on and off-plot noise mitigation can be provided prior to development being permitted within noise sensitive areas B, C, and D as shown in figure 2 of the Cranbrook Plan. These policies, therefore, should be read together with CB17 taking in a broader scope in terms of amenity of residents across Cranbrook.</p>	
2.3	<p>Is the inclusion of Nationally Described Space Standards (NDSS) justified and consistent with national policy?</p>	<p>Q208 – Space standards</p>
2.4	<p>The National Planning Policy Framework (NPPF) states that planning policies should create places with a high standard of amenity for existing and future users, making use of the nationally described space standard (NDSS) where the need can be justified.¹ Strategy 12 in the East Devon Local Plan 2013 to 2031 (adopted January 2016) is clear that the highest design standards will be required at Cranbrook. Policy CB17 in the Cranbrook Plan – Submission Draft [Cran001] reflects the NPPF and East Devon Local Plan by stating that new dwellings should meet the nationally described space standard (NDSS).</p>	

¹ National Planning Policy Framework, paragraph 127f and footnote 46.

- 2.5 Evidence prepared by the council, set out in submitted document Cran012, justifies the inclusion of NDSS in the Cranbrook Plan. This evidence reflects planning practice guidance² in taking account of the need, viability, and timing of introducing the standard.
- 2.6 In terms of need, the evidence shows that most new dwellings being built at (already permitted) Cranbrook do not meet the NDSS: 20% of dwellings met the gross internal floor area standard at Cranbrook, compared to 35% elsewhere in East Devon [Cran012, paragraph 3.4]. As this initial assessment highlighted a potential issue at Cranbrook, further, more detailed, analysis at Cranbrook considered more sites and other aspects of the NDSS relating to bedroom floor space and width. This revealed that of a total of 690 permitted dwellings which were assessed, only 41 (6%) met the NDSS [Cran012, paragraph 3.5-8]. The evidence highlights some of the potential adverse impacts of insufficient internal space, such as a lack of space to prepare and eat food, store possessions, socialise, study, work, relax, or adapt in case of changed circumstances [Cran012, paragraph 3.9-16].
- 2.7 In addition, Cranbrook is one of only 10 places across the country to be designated as a 'Healthy New Town' – providing sufficient internal space in new homes is clearly consistent with this status [Cran012, paragraph 3.12]. Since preparation of the councils' NDSS evidence, the NHS has published learning principles from the Healthy New Towns programme – this includes the point that Local Plans should require homes to meet the NDSS as part of designing housing to support health and wellbeing.³

² Planning practice guidance, Reference ID: 56-020-20150327: <https://www.gov.uk/guidance/housing-optional-technical-standards#internal-space-standards>

³ Putting Health into Place – Design, Deliver and Manage, section 7.2, NHS et al, September 2019: <https://www.england.nhs.uk/wp-content/uploads/2019/09/hip-2-design-deliver-manage.pdf>

- 2.8 The viability assessment of the Cranbrook Plan [Cran063, Cran064] demonstrates that the Plan is viable, incorporating dwelling sizes that meet the NDSS. Whilst there will be slightly higher build costs from constructing larger homes, Government guidance is clear that the cost of policies should come off the land value⁴ so the affordability of new homes should not be significantly affected. It is unlikely to that the larger homes will impact upon the housing land supply – several other local authorities in the area already require the NDSS [Cran012, paragraph 3.25-26], so it is assumed the major housebuilders (who are likely to deliver the vast majority of housing in the Cranbrook Plan) already have house types that achieve the NDSS.
- 2.9 The council has considered the timing of introducing the standard, and whether there should be a transitional period following adoption of a new policy to enable developers to factor the cost of space standards into future land acquisitions.⁵ However, planning applications have already been submitted for the expansion areas in the Cranbrook Plan, and any delay in introducing the NDSS following adoption of the Plan could mean the policy would not apply. The cost of policies should be accounted for in the price paid for the land.
- 2.10 Overall, the inclusion of NDSS in the Cranbrook Plan is justified, being based on proportionate evidence;⁶ and consistent with national policy, through creating places with a high standard of amenity.⁷

⁴ Planning practice guidance, Reference ID 10-001-20180724, 10-006-20180724; 10-012-20180724: <https://www.gov.uk/guidance/viability#viability-and-plan-making>

⁵ Planning practice guidance, Reference ID: 56-020-20150327: <https://www.gov.uk/guidance/housing-optional-technical-standards#internal-space-standards>

⁶ National Planning Policy Framework, paragraph 35.

⁷ National Planning Policy Framework, paragraph 127f.

<p>2.11 How might the delivery rates be affected by the introduction of NDSS?</p> <p>2.12 It is considered that the introduction of the NDSS will not have a significant effect on housing delivery rates at Cranbrook. Other local authorities, locally and beyond, already apply internal space standards [Cran012, paragraph 3.25]. Indeed, since preparation of the Cranbrook Plan evidence, the Plymouth and South West Devon Joint Local Plan has also adopted the NDSS.⁸</p> <p>2.13 Therefore it is assumed that the major housebuilders, who are likely to build out the vast majority of Cranbrook, already have house types that achieve the NDSS [Cran012, paragraph 3.25-26]. The Impact Assessment prepared by the Government when considering the NDSS states that having a single nationally applicable space standard will significantly reduce construction and compliance costs across the country, through more cost effective delivery of standard housing layouts which can be type approved.⁹</p> <p>2.14 During the Government’s Housing Standards Review, which resulted in the introduction of the NDSS as an optional requirement for local authorities, developers considered that any impact on numbers or density was likely to be marginal, with small adjustments to dwelling mix off-setting any overall effect [Cran012, paragraph 3.37].</p> <p>2.15 The council has considered the impact of introducing the NDSS upon housing density, as this could have implications for housing delivery, by</p>	<p>Q209 – Delivery rates</p>
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⁸ Plymouth and South West Devon Joint Local Plan, Inspector’s Report 18 March 2019, paragraph 220:
<https://www.plymouth.gov.uk/sites/default/files/PSWDJLPFinalReport.pdf>

⁹ Housing Standards Review – Final Implementation Impact Assessment, DCLG, March 2015, paragraph 47:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418414/150327_-_HSR_IA_Final_Web_Version.pdf

looking at specific examples. The evidence shows that only a relatively small increase in footprint is needed for homes that meet the NDSS, compared to those that do not [Cran012, paragraphs 3.30-37] – it is considered that this can be achieved through minimal reductions in other uses (e.g. garden space or other open space), and can therefore be designed to not significantly affect housing density.

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

2.17 No.

**AQ27 – Main
modification**

Issue 28: Digital Connectivity

Response	Inspectors Question(s)
<p>3.1 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?</p>	<p>Q210- Capacity for more than one provider</p>
<p>3.2 The explanatory text to this policy makes it clear that Cranbrook was one of the first developments in the country to secure the roll out of Fibre to the Premise (FttP) technology. As such there is no copper infrastructure on site as befits a 21st century town. The role of digital connectivity in supporting access to goods and services and underpinning commerce is well known and is fundamental to the future development of the town.</p>	
<p>3.3 The experience for the residents of the first phase of Cranbrook revealed that whilst fibre networks guarantee speed of connection they do not necessarily offer choice. For the first 1100 homes the fibre network is provided by Independent Fibre Networks Limited which has a more limited 'ecosystem' of Internet Service Providers relative to the more usual Openreach infrastructure. The lack of availability of particular forms of secure connection also delayed the opening of the Post Office and caused issues for the Health Centre. The Council's objectives underpinning this policy are therefore very simple – to promote both speed and choice of provision.</p>	
<p>3.4 Cranbrook is being delivered through a commercially driven model. The choice of initial network provider is therefore dictated by the relevant developer(s). The policy references the 'minimum' expectation that ducting with capacity for more than one provider to lay sub ducting and/or</p>	

fibre optic cable will be provided to enable delivery of multi-operator Fibre to the Premises and sufficient mobile connectivity. This requirement is to enable future choice and resilience without the need for disruptive works to lay further ducts (the 'dig once' principle). The Council considers that this is a feasible and justified policy and fully in line with national policy. The Government's 'New build homes: superfast broadband connectivity options' policy (April 2016) helps developers understand superfast broadband connectivity options for new build homes. This was supported by a joint letter between the HBF and Openreach setting out a cost sharing approach for the provision of superfast broadband on new housing sites.

3.5 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/498102/HBF-penreach_FINAL.pdf

3.6 It is a manifesto commitment of the current Government to cover the whole of the UK with gigabit capable broadband services by 2025. Locally we are seeing that further operators are entering the market place (e.g. Jurassic Fibre are currently rolling out their own network in East Devon) and it is essential that the core infrastructure serving the residents of Cranbrook is resilient and able to adapt and develop over time.

3.7 Ultimately there is no substitute for having fibre in the ground and fibre connectivity is also fundamental to underpinning the operation of mobile networks. The lack of good mobile connectivity has been an issue for the town, particularly given the young population. The Council undertook a study in April 2015 to understand this issue in more detail. Again Policy CB18 is designed to address these issues and to ensure a resilient infrastructure which is capable of supporting evolving requirements, such as 5G or the operation of CCTV, over time.

3.8 AQ28. Are any Main Modifications proposed in relation to Issue 28?	AQ28 – Main modification
3.9 No modifications are proposed in relation to this issue.	

Issue 29: Sustainable travel

Response	Inspectors Question(s)
<p>4.1 Is Policy CB19 justified and effective with respect to travel plans, sustainable travel and parking?</p>	<p>Q211 – Travel plans, sustainable travel & parking</p>
<p>4.2 Yes - It is anticipated that there would be individual travel plans for residential, school, employment, retail and leisure developments. All developments that generate significant amounts of movement will be required to provide a travel plan to promote sustainable transport in accordance with paragraph 111 of the NPPF.</p>	
<p>4.3 Each plan should detail objectives, actions, outcomes, responsibilities and the intervals it should be reviewed to enable the approach to remain justified and effective.</p>	
<p>4.4 The Infrastructure Delivery Plan includes costings for Travel Planning at £285,000 which will be proportionally split by housing delivered and this has been included in the Viability work undertaken by Three Dragons.</p>	
<p>4.5 Chapter 9 of the NPPF 'Promoting sustainable transport' requires that transport issues including opportunities to change transport technology and usage and promoting cycling are identified, pursued and realised.</p>	
<p>4.6 In addition paragraph 104 highlights that planning policies should support facilities such as cycle parking and therefore minimum standards for spaces supporting shared cars and electric bicycles is justified in helping to deliver greater sustainable travel options to the town.</p>	

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

4.8 No

**AQ29 –
Main
modification**

Issue 30: Plug in and ultra-low emission vehicle charging

Response	Inspectors Question(s)
<p>5.1 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?</p> <p>5.2 The wording of policy CB20 requires a combination of charging points and the installation of the underground infrastructure to allow vehicle charging points to be delivered at a future point. This enables charging points to be provided straight away to meet demand but also the future expansion of a network of charging points and adaptability to changing technologies through enabling the future provision of charging points for different vehicles and types of charging points that may emerge in the future. This has been costed as part of viability work that has been carried out on behalf of us by Three Dragons.</p>	<p>Q212 – Futureproofing & viability</p>
<p>5.3 How will the maintenance of off plot facilities be achieved?</p> <p>5.4 Under policy CB20, category 2 and 3, included within the table refer to “off plot facilities”. It is intended that Category 2 (parking courtyards serving residential properties) would fall under the responsibility and ownership of the future occupiers. Category 3 refers to on street parking, where the policy does not seek charging points, but rather encourages the infrastructure to be put in place, to allow these to be brought forward</p>	<p>Q213 – Off plot facilities</p>

<p>at a future point. It is considered that these could be delivered and maintained by Devon County Council should they have the ability to do so or in partnership with a private or other public sector provider.</p>	
<p>5.5 How might the viability be affected by the requirement for such provision?</p> <p>5.6 The Infrastructure delivery plan lists vehicle charging points as priority one which is classed as critical infrastructure. It has been included in the Viability work undertaken by Three Dragons and is considered to be deliverable by the developers.</p>	<p>Q214 - Viability</p>
<p>5.7 Are any Main Modifications proposed in relation to Issue 30?</p> <p>5.8 No.</p>	<p>AQ30 – Main modification</p>

Issue 31: Parking and Cycle

Response	Inspectors Question(s)
<p>6.1 Is Policy CB21 consistent with national policy in respect of cycle parking requirements?</p> <p>6.2 Yes – Chapter 9 of the NPPF ‘Promoting sustainable transport’ requires that transport issues including opportunities to change transport technology and usage and promoting cycling are identified, pursued and realised.</p> <p>6.3 In addition Paragraph 104 of the NPPF states that planning policies should:</p> <p>d) provide for high quality walking and cycling networks and supporting facilities such as cycle parking.’</p> <p>6.4 In order to realise the maximum usage of cycling the policy requires that all new residential dwellings at Cranbrook, will need to include safe, secure and undercover space specifically designed, or readily useable, for bicycle storage at a ratio of 1 bicycle storage space per bedroom.</p> <p>6.5 The plan acknowledges that where garages are provided, these will count as the bicycle storage space for the respective dwelling ensuring that the policy is both consistent and justified with national policy and helps to deliver greater sustainable travel options to the town.</p>	<p>Q215 – Consistency with NPPF</p>

<p>6.6 Is Policy CB21 justified and effective with respect to car parking provision? Should such provision include integral garage spaces?</p> <p>6.7 Provision of car parking at Cranbrook to date, including on-street and parking private parking spaces, is a matter which to date has proven an important topic for residents and levels of success in layout are varied across the town.</p> <p>6.8 This highlights the necessity to ensure that future development at Cranbrook delivers parking provision of a standard which takes account of accessibility, type, mix and use of development, local car ownership levels and is suitable both for the current and future needs of residents in line with paragraph 105 of the NPPF.</p> <p>6.9 To ensure future development is supported by parking that is adequate and appropriate to meet user needs all future parking will be required to meet minimal space standards, to be set out either in guidance from Devon County Council as is currently the case or in a supplementary planning document in order to allow for regular review. At present the standards are set out in Devon County Council’s ‘Highways Development Management Advice For The Determination Of Planning Applications’ published in August 2018.</p> <p>6.10 At Cranbrook, garages have often been provided of a size which would not easily fit a modern car, which lowers the likelihood of use for parking. Furthermore and on a wider scale than Cranbrook, even where garages are of a more adequate size, they are often used for storage purposes, thereby eliminating the potential for parking use.</p>	<p>Q216 – Car parking provision</p>
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6.11 In order to ensure that adequate parking provision is made, it is therefore appropriate to discount garages when calculating the level of parking in a development. However, in recognising their use for secure and dry storage, where provided they will count as a dwelling's bicycle storage facility.	
6.12 Are any Main Modifications proposed in relation to Issue 31? 6.13 No	AQ31 – Main modification