

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

Response to the Inspectors Matters Issues and  
Questions

Matter 18 Town Centre

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## Issue 32: Is the Cranbrook Town Centre Policy CB22 justified and effective?

Response	Inspectors Question(s)
<p>1.1 <b>Is policy CB22 consistent with National Policy?</b></p> <p>1.2 CB22 recognise boundaries for the Town Centre and as sets a clear vision for the area. Within the Framework paragraph 85 set out a number of key requirements for policies which address town centre. The following is a summary of the most relevant</p> <ul style="list-style-type: none"> <li>• Promote the long term viability and vitality of an area,</li> <li>• Provide definition for the extent of the area</li> <li>• Create new markets;</li> <li>• Allocate a range of suitable sites to meet the scale and type of development likely to be needed over the next 10 years; and</li> <li>• Recognise that residential development can play an important role in ensuring the vitality of town centre on appropriate sites</li> </ul> <p>1.3 It is considered that Policy CB22 achieves these requirements by</p> <ul style="list-style-type: none"> <li>• Setting a clear vision for the area</li> <li>• Defining the boundary for the town centre on the Policies plan;</li> <li>• Seeing to focus the town around a market square which can act as a multi-functional space to a mixed commercial and cultural need for the new town</li> <li>• Recognising a list of key facilities/developments that should be delivered within the Town centre</li> </ul>	<p><b>Q217 – Consistency with NPPF</b></p>

<ul style="list-style-type: none"> <li>• Permitting residential units on upper floors to help facilitate an increased number of people the town centre (recognising that a good population within the heart of the area is vital for sustaining the local economy, and maintaining an attractive welcoming and vibrant environment).</li> </ul> <p>1.4 On this basis it is considered that CB22 is consistent with National Policy.</p>	
<p>1.5 <b>How will the expansion areas facilitate the delivery of the town centre which is already consented given the text in paragraph 4.48 of the plan?</b></p> <p>1.6 The town centre is already subject of an outline planning consent but no reserved matter applications (other than the pub) have yet been applied for and or granted. A number of the key uses identified within Policy CB22 – are already required (as either land only or land and buildings) through the existing consented Section 106 agreement which links with the live outline permission. These are clarified as follows:</p> <ul style="list-style-type: none"> <li>• A health and well-being hub (land already secured)</li> <li>• Civic centre (Town Council Offices) (Land and building)</li> <li>• Library (Land and building but not fit out)</li> <li>• Children’s Centre (Land and building but not fit out)</li> <li>• Youth centre (Land and building but not fit out)</li> <li>• Extra Care housing (land only)</li> </ul> <p>1.7 In addition it is recognised that of the consented outline there is likely to be only a residual number of units/accommodation left for the town</p>	<p><b>Q218 – Delivery of town centre</b></p>

<p>centre area once the existing residential parcels elsewhere in the town are finally fully consented. At the very least detailed reserved matters applications will be required, but more likely it is expected that a new outline /or full application will be required to increase the number of houses/flats that would otherwise result if the existing outline permission was relied upon.</p>	
<p>1.8 The expansion areas can therefore allow/assist with the delivery of buildings associated with the Health and well-being hub and extra care and the fit out of the Devon County Council services – namely library, children’s services and youth services building(s).</p>	
<p>1.9 In addition within an increased size of population that makes up the town as it continues to expand, this will help support the range of retails and social/experiential services that are viable in the town.</p>	
<p>1.10 <b>Is the approach to A5 class uses in the Town Centre consistent with National Policy?</b></p>	<p><b>Q219 – A5 class uses &amp; NPPF</b></p>
<p>1.11 The Council consider that the inclusion of A5 use class premises would not undermine national policy as set out in para 91c of the National Planning Policy Framework and therefore accords with the policy framework for supporting healthy lifestyles.</p>	
<p>1.12 As well as providing much needed housing to meet the growing need of the population, The Cranbrook Plan looks to embed within it the principles of designing good health and well-being outcomes into the town and encouraging people to lead active lifestyles.</p>	

- 1.13 To enable and support healthy lifestyles, especially where this would address identified local health and well-being needs, the plan seeks to provide accessible infrastructure to include facilities, local shops and as part of this access to healthier food. This is not to exclude A5 (Hot food takeaway) uses completely but to provide a focus towards good health and well-being related food outlets in the town that will support residents in making balanced and healthier choices.
- 1.14 The Government commissioned [Foresight Report](#)<sup>1</sup> of 2007 which examined the reasons for the rising and significant levels of obesity, concluded that there were a 'complex web' of factors involved ranging from unhealthy diets, low levels of physical activity as well as subtler causes such as societal influences and environmental factors which can make it difficult to make healthy choices.
- 1.15 Recognising the relationship between the health impacts, nutrition and hot food takeaways, evidence suggests that the presence of hot food takeaways in high numbers has a relationship with increased levels of excess weight and obesity. The proposed policy approach therefore seeks to limit the amount of A5 uses to 1 unit of A5 use class for every 3 units of other A use classes within the neighbourhood centres. This will be a cumulative calculation, taking into account any existing premises. It is considered that this approach would not lead to an over concentration of A5 uses within any one individual centre.

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1.16 **How is the approach to A5 class uses consistent with the Policy CB1 in relation to Health and Well-being?**

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<sup>1</sup> <https://www.gov.uk/government/publications/reducing-obesity-future-choices>

<p>1.17 Recognising the response to Q221, Policy CB1 seeks to place the Health and well-being of individuals and the community as a whole at the heart of the plan. With specific reference to A5 uses, bullet point 3 of Policy CB1 recognises that all proposals and decisions are coordinated to address the wider determinants of ill health. In this regard the restrictions on A5 provision seek to facilitate this requirements.</p>	<p><b>Q220 - A5 class uses &amp; Policy CB1</b></p>
<p>1.18 <b>What level of confidence is there that the town centre will be delivered and how would this impact on the timing, delivery or phasing of the four expansion areas in the plan?</b></p> <p>1.19 There remains confidence that the Town Centre will be delivered – not least as some the key building blocks for the area remain as obligations within the existing Section 106 agreement that lies with the outline consent for Cranbrook phase 1.</p> <p>1.20 As some of the town centre developments are reliant on funding being derived from future S106 obligations, it is therefore important that these expansion areas are commenced.</p> <p>1.21 There is no need to otherwise link/phase the delivery of the Town Centre with the expansion areas.</p>	<p><b>Q221 – Town centre delivery</b></p>
<p>1.22 <b>What is the delivery mechanism for the town centre and market square and how will the core infrastructure be provided - particularly given multiple land ownerships?</b></p>	<p><b>Q222 – Delivery mechanism &amp;</b></p>

<p>1.23 The Town Centre remains under the control of the consortium of developers who are currently building out Cranbrook Phase 1. As the Town centre land is under a single point of control and the Council have traditionally worked well the developers in delivering the Town’s infrastructure, this help to provide assurance that suitable facilities will be delivered.</p> <p>1.24 In recognising that town centre facilities comprising health and well-being hub; leisure centre; and youth services, library and children’s centre fit out, will only be delivered from third party contributions derived from all expansion areas, the Council recognise that it will need to play a critical role in helping to collate these contributions and ultimately procure delivery either itself or in partnership with the consortium. In this regard the complexity that can arise from the multiple ownerships that are noted from the various expansion areas can be mitigated for.</p> <p>1.25 In terms of the specifics for the market square there is currently no direct funding mechanism in place. However there is general agreement that such a facility is of significant benefit for a town providing a commercial and cultural space for the community. It is expected that such public realm improvements would be derived from third party external funding associated with a commercial development or secured from additional housing that is permitted within the town centre area.</p>	<p><b>infrastructure provision</b></p>
<p>1.26 <b>What evidence is available to justify the requirement for residential uses above commercial uses in the Town Centre? How will the requirement for access to shared and private outdoor space be achieved in this regard?</b></p>	<p><b>Q223 – Residential uses above</b></p>

<p>1.27 Residential uses above commercial uses in the town centre are required for efficient use of land and to maintain the economic sustainability of the commercial uses in the town centre. Well-designed mixed use development incorporating residential development creates activity and diversity in the town centre which reduces crime and fear of crime<sup>2 3</sup> while increasing physical activity and reducing car use and pollution with consequential health benefits<sup>4</sup>.</p> <p>1.28 Residential development in town centres creates walkable mixed-use areas that build and maintain community identity and social cohesion which has significant positive health benefits<sup>5</sup>.</p> <p>1.29 Placing the residential development above commercial units helps raise density while maintaining a mix of uses. Residential density at the town centre is vital to support local services at the town centre and the provision of public services, including public transport. A residential density within the town centre of over 50dph is required to achieve the necessary housing numbers around the centre to support these services<sup>6</sup> necessitating residential development above commercial.</p> <p>1.30 Such an approach is also supported within National guidance where it recognises that “Residential development in particular can play an important role in ensuring the vitality of town centres, giving communities easier access to a range of services. Given their close</p>	<p><b>commercial uses</b></p>
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<sup>2</sup> Gehl J., (2010), *Cities for People*, Island Press

<sup>3</sup> Monahan S, Gemmell A. (2015), 'Reducing crime hotspots in city centres', *BRE*

<sup>4</sup> Frank L, et al (2005), 'Linking objectively measured physical activity with objectively measured urban form: findings from SMARTRAQ', *American Journal of Preventative Medicine* 28 (2S2), pp.117-125.

<sup>5</sup> Leyden, K. 2005 Social capital and the built environment: The importance of walkable neighbourhoods, *American Journal of Public Health*, 93: (9): 1546-1551.

<sup>6</sup> London Development Agency LDA (2000) *Urban Design Compendium*, English Partnerships

<p>proximity to transport networks and local shops and services, local authorities may wish to consider locating specialist housing for different groups including older people within town centres or edge of centre locations.”</p> <p>Paragraph: 001 Reference ID: 2b-001-20190722 Revision date: 22 07 2019</p> <p>1.31 The council is currently working on the design of the town centre at masterplan level. The design is based around desire lines and with development arranged as a dense perimeter blocks. Given the town centre location, private outdoor space can be satisfied using balconies or smaller garden spaces through good design like that demonstrated at Odham’s Walk. Outdoor space in the town centre has a particularly important role in creating and supporting social activity. Semi-private courtyard gardens within the perimeter blocks can provide high quality spaces that are enjoyed by the residents around them, helping create social interaction.</p>	
<p>1.32 <b>What is the delivery mechanism for the neighbourhood centre (in addition to the town centre) given the low take up of premises in phase 1? How might this impact on the proposals?</b></p> <p>1.33 The Masterplan and this policy had regard to the recommendations and evidence within the Cranbrook Economic Development Strategy. This puts forward a ‘business ladder’ approach to the development of an indigenous economy at Cranbrook, led by the community but delivered collaboratively alongside developers, Public Sector and business groups including the Local Enterprise Partnership.</p>	<p><b>Q224 – Neighbourhood centre delivery mechanism</b></p>

<p>1.34 The Cranbrook Economic Development Strategy (CEDS) notes that the agents for the commercial premises developed as part of the neighbourhood centre in Phase 1 reported strong demand, with a further 58 separate enquiries for business premises at Cranbrook in 2017 alone recorded by Exeter City Council prior to the town centre being marketed by the developers.</p> <p>1.35 This provides confidence that there is demonstrable demand for premises at Cranbrook and that the impact on proposals is therefore positive.</p>	
<p>1.36 <b>Modular units are referred to; around what core would these operate and how will the ‘meanwhile’ or temporary uses referred to in the Consultation Statement and Policy CB22 be delivered?</b></p> <p>1.37 The 2015 <a href="https://eastdevon.gov.uk/media/2260179/cranbrook-economic-development-strategy.pdf">Cranbrook Economic Development Strategy</a> (<a href="https://eastdevon.gov.uk/media/2260179/cranbrook-economic-development-strategy.pdf">https://eastdevon.gov.uk/media/2260179/cranbrook-economic-development-strategy.pdf</a>) (CEDS) and Our Place delivery plan put forward modular units, and ‘meanwhile’ or temporary uses, as a way of providing premises for community and businesses uses at the point of need.</p> <p>1.38 Conventional development methods incur high initial capital costs with a high level of risk, especially at a time of economic uncertainty. Modular, temporary units and meanwhile uses enable low-cost and reduced risk delivery of premises to cater for the reasonable demands and expectations of an already substantial community. The ‘core’ around which these will operate is a market space formed from the arrangement of units that can provide a space for enterprise, cultural and community activity.</p>	<p><b>Q225 – Modular, meanwhile &amp; temporary uses</b></p>

<p>1.39 The units proposed will provide a variety of relatively small commercial spaces that will be available for a wide range of uses on short-term, low risk leases.</p> <p>1.40 The units themselves are expected to be delivered via a partnership of public and private organisations and capital with the district and town councils and the developer / landowners working together.</p>	
<p>1.41 <b>How will the town centre public space be maintained and funded in the long-term?</b></p> <p>1.42 For the majority of the Cranbrook area, the town does not have a management company instead having a proactive Town Council who have or are in the process of adopting the various areas of open space and recreation.</p> <p>1.43 Detailed discussions have not yet taken place in terms of the long term maintenance of the town centre open space but it anticipated that the Town Council may be interested. The important aspect that would need consideration, were this to occur, would be try to ensure that the area is as useable and as versatile as possible to allow the holding of revenue generating activities. Such activities help to fund the long term maintenance of the areas and therefore reduce the risk that the public funds of the Town Council would otherwise be exposed to should they be willing to adopt these areas. If the Town Council did not adopt the public space areas then it would necessitate the retention of such areas by either the private developer or its transfer to a management company. In either case a mechanism to secure funding would be required – either from tenants on adjacent land or from commercial events and activities held on the land.</p>	<p><b>Q226 – Public space maintenance and funding</b></p>

<p>1.44 <b>How will the proposed market be operated and maintained in the future? What is the sustainability of the proposal?</b></p> <p>1.45 In a similar vein to the Councils response to Q226, it is anticipated that the proposed market square will be operated and maintained by the Cranbrook Town Council.</p> <p>1.46 Full costings for the running of the market and market square have not been carried out at this stage. However, these are expected to generate revenue to support their management and maintenance from market rents and concessions as well as cultural and other events.</p>	<p><b>Q227 – Market operation &amp; maintenance</b></p>
<p>1.47 <b>Would any of the new residential development be sustainable without the delivery of the town centre if so, what amount?</b></p> <p>1.48 The key town centre facilities which are required already have identified and prescribed triggers within the existing Section 106 agreement. Between 2000 dwellings and 3450 dwelling the Phase 1 developers are required to provide 500sqm retail, a Town Council building, and land and shell buildings for children’s centre youth services building and library. There is also a requirement to transfer land for a health and well-being hub and extra care housing to a Local Authority. While it is expected that additional town centre facilities including land for a leisure centre as well as other development facilitating additional retail and commercial activity, there is no mechanism for currently insisting on these – as set out in response to</p>	<p><b>Q228 – Residential development sustainability without town centre</b></p>

<p>matter 14, future applications for the Town centre is expected to address some of these requirements.</p> <p>1.49 In any event however the Council is not seeking to limit development of the expansion areas until certain aspects of the Town Centre is delivered. The sustainability of the expansion areas is supported and enhanced by delivery of the Town centre but not beholden to it, given the triggers and safeguards that are already in place.</p>	
<p>1.50 <b>How will the Council achieve the delivery of the Town Centre prior to any new phases of development?</b></p> <p>1.51 The Delivery of the town centre is not linked to the delivery of the expansion phases. Triggers for much of the key infrastructure (either as land only or land and buildings) are set with the existing Cranbrook Phase 1 development and the associated Section 106 agreement. In addition the Cranbrook IDP recognises that investment into the Town Centre is required from the expansion phases to deliver a number of the required buildings – delivering on the land obligations that are secured from Phase 1. On this basis there is no need to further link the Town Centre delivery to delivery of the expansion phases.</p>	<p><b>Q229 – Delivery prior to new development</b></p>
<p>1.52 <b>How will the space required for SUDS serving the town centre be delivered?</b></p> <p>1.53 Space for SuDS serving the town centre will be delivered through planning agreement with applicants for development within it.</p>	<p><b>Q230 - SUDS</b></p>

<p>1.54 The evidence for the drainage needs of the town centre contained within the Landscape, Biodiversity and Drainage Strategy (LBDS) provided with the original planning permission for Cranbrook (03/1900/MOUT) suggests that these needs will largely be met by SuDS basins that are already provided within the neighbouring Country Park at Cranbrook. Additional SuDS requirements that might be necessary within the town centre itself will be provided and incorporated as part of urban landscape design.</p>	
<p>1.55 <b>How will the parking requirement for the significant uplift in the average density be delivered in relation to the Town Centre Uses?</b></p> <p>1.56 There are a variety of means for dealing with car parking in the town centre not least by maximising access to public transport, maximising cycle parking and encouraging where possible walking trips to the various shops and services; thereby reducing the level of car ownership.</p> <p>1.57 Nevertheless the Plan sets out an average minimum car park ratio which in the town centre should not be exceeded. To accommodate the spaces it is expected that these are distributed through a mix of shared on street parking, surface level car parks and undercroft parking – the latter being the most land efficient method as it allows car parking to be accommodated within the footprint of the building. Through the employment of such mechanisms an uplift in density can still be accommodated whilst minimising the impact on the total land take necessary.</p>	<p><b>Q231 – Parking requirement</b></p>

<p><b>1.58 How will the required improvements to the rail crossing be achieved given that some traffic will be drawn from the north of the rail line?</b></p>	<p><b>Q232 – Rail crossing improvements</b></p>
<p>1.59 It is not currently established that improvements to the level crossing are necessarily required by Network Rail and have not been costed or identified within the Cranbrook IDP. While safety has to be a priority, it is important to recognise that Network Rail did not find it necessary to seek improvements over and above those related to minor re-profiling works when Cranbrook Phase 1 (including the Town Centre) was permitted. This comprises development that is immediately adjacent to the crossing and therefore has a direct link to and a potentially far greater impact on the crossing.</p>	
<p>1.60 The four expansion areas are located remote from the crossing and therefore the number of trips/use that affect the crossing and could be directly and reasonably linked to the expansion area is considered limited. The majority of trips from the expansion areas would be to and from the Town Centre and to evidence the trips beyond e.g. to Broadclyst is considered difficult to quantify but is likely to be limited in nature.</p>	
<p>1.61 If improvements are required as a result of the expansion area a proportionate cost for the barrier improvements would need to be evidenced and would then need to be considered in relation to the IDP.</p>	
<p>1.62 Barrier improvements would in any event be needed if a passing loop is provided on the line and as such it is possible that such works would be resolved as part of a much larger project in any event.</p>	

1.63 <b>Are any Main Modifications proposed in relation to Issue 32?</b>	<b>AQ32 – Main modification</b>
1.64 There are no main modification proposed at this time.	