

Date: 12 July 2021
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Our ref: Cranbrook Plan DPD



Mrs J Wilson
c/o Ian Kemp
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Dear Mrs Wilson

Cranbrook Plan examination

Council Response to Inspectors Letter

We refer to your letter dated the 2nd July which set out a number of questions in response to our submission of the 5th June. We appreciate the opportunity to comment and hope that we can bring further clarity to the points raised. In addition we also want to highlight a statement of Common Ground (SOCG) agreed between Hallam Land Management, Taylor Wimpey, Persimmon Homes, Redrow Homes and the Carden Group and ourselves which we sent across on the 6th July. This sets out our respective positions on a number of aspects and is something that we'll refer to within this letter as it should help address at least in part, a number of the questions that you have raised.

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1. Development Contributions (NPPF Paragraph 34)

Through its work with professional consultants and having had the inputs independently assessed, the Council is of the opinion that it has undertaken a robust viability appraisal which demonstrates that at the plan making stage, the policies proposed, are viable. We believe that the approach follows both the guidance and the NPPF and recognises the full range of obligations and expectations identified including the delivery of affordable housing at 15%.

However throughout the plan making process the Council have been very aware of the need to engage with the development industry and to reach agreement between us where possible. The statement of common ground now submitted is clear in capturing our current positions and sets out that there is a residual £31m gap between us which results from our respective views on 4 key inputs into the appraisal. Importantly the SOCG also sets out that of the £31m gap and in the event that the participant's arguments are persuasive to you, then up to £27m can be found through identified amendments to the policies, together with the use of a revolving infrastructure fund. While there would still be a £4m shortfall between us, this is a small amount compared to the overall GDV for the appraisal and would we suggest, be within the margin for error.

East Devon are not advocating that any of the savings outlined are necessary but are equally aware of the strength of views that are being levelled against our appraisal. The potential further financial savings are only necessary if you are not satisfied with the Council's position and the evidence that we have put forward (where we allow for a buffer of ca £40m), and instead consider that a greater buffer is necessary to have a deliverable plan and one that is ultimately sound.

2. Further £4m savings

This was alluded to within our June submission and referenced further within the SOCG. We consider that if £4m of savings are necessary, this can be found through the following omissions/change to Policy and amendments to the accompanying IDP:

Item	IDP No.	Current CEA Value	Potential CEA Value	Potential Saving	Impact
Health and Wellbeing	41	£7,000,000	£6,250,000	£750,000	An increase in the residual gap meaning that the spec would need to be reduced or greater external funding secured
Fire Station (Blue light facility)	37	£1,400,000	£850,000	£550,000	An increase in external funding would need to be secured
Sustainable Transport	49	£6,378,000	£3,998,000	£2,380,000	PSD 26 ¹ shows the breakdown of the original request. The retained budget would still allow an increase in bus services to 15 minutes. The remaining residual budget would be used to provide some of the evening, weekend and 10 minute services originally sought but this would be less comprehensive than proposed
1x Adult Football pitch (from Treasbeare hub)	22 & 24	£849,880 (Pitches) £2,808,000 (land)	£749,880 £2,586,000	£100,000 £222,000	Since the SLRC report ² was prepared and due to the clarified status of the AGP which was associated with Cranbrook Phase 1, this reduction in pitch provision would maintain a policy compliant land take provision when assessed against Strategy 43 of the Local Plan
Total				£4,000,000	

¹ <https://eastdevon.gov.uk/media/3720815/psd26-dcc-revised-public-transport-request.pdf>

² <https://eastdevon.gov.uk/media/2302158/SLRC-Addendum-Report.pdf>

3. Evidence of support for equalisation

The statement was made based on feedback that we had received during the engagement with a number of participants. This is now captured within the Statement of Common Ground (see point IV of that document) where it recognises that the format of the IDP is agreed. Our understanding of format is that this refers to the 4 categories of infrastructure and the approach to land equalisation both of which have been shared with the participants who are party to the statement.

4. Common Ground

Please see the statement of common ground.

5. Paragraphs 6 & 7

Further to the additional clarification received on 8 July we can confirm that the reduction of £12.9m to provide a new base to the IDP is supported by participants. They have not however been engaged in the appointment of the Independent review of the inputs used in the appraisal. This was an exercise undertaken by the Council.

In terms of participation, we can confirm that a draft copy of the main modifications was shared with all participants who were party to the set of hearing sessions concerning viability - the topic on which we have been focussing attention. For clarity those participants comprise:

- RPS representing Persimmon Homes (**Cobdens**)
 - Bell Cornwell representing Cranbrook LVA (Farlands) (**Cobdens**)
 - Baker Estates (**Grange**)
-

-
- Carden Group and Redrow Homes (**Treasbeare**)
 - David Lock Associates representing Hallam Land Management and Taylor Wimpey (**Bluehayes**)
 - Devon County Council
 - Mr Boekman

Engagement with all of the above participants has occurred in the preparation of our latest submission, although there has been particularly detailed dialogue with Devon County Council and separately the participants who are signatory to the joint Statement of Common Ground submitted last week and who represent much of the proposed allocations for Bluehayes, Treasbeare and Cobdens. These participants grouped themselves together for the purpose of the Statement. Cranbrook LVA is the other significant promotor within the Cobdens area but has not currently expressed a desire to undertake a similar SOCG/position statement although we continue to work constructively with them.

There has historically been less concern expressed from Baker Estates about viability but where comments have been received we have recorded these in the appendices included in our letter from June and in addition tried to recognise where possible their observations within the latest set of proposed main modifications. There was no representation from Stuart Partners (represented by Mr McMurdo at the examination hearings) or Mr Mingo (the other land owners within the Grange area) at the last set of hearing sessions in respect of viability.

6. Table labelled Appendix 1

The table labelled Appendix 1 is part of the letter which we issued to participants on 13th April. It summarises the participant's responses arising from our earlier correspondence/consultation with

them on the 15 February. As such it captured a particular point in time and was collated before we undertook the scenario testing and before we had confirmed our ability to save £12.9m from the Infrastructure budget. While the SOCG is only with some of the participants, the table in Appendix 1 also predates that document and therefore needs to be read in that context.

7. Cranbrook Infrastructure Delivery Plan (CIDP)

The summary of the 4 categories of infrastructure provision set out within your letter of the 2 July are correct.

In respect of your concerns over repeating the detailed provision in CB6, we acknowledge that there is some repetition. However the Policy is framed with the aim of making the whole plan easier to use and avoiding the potential for ambiguity in due course. We respectfully believe that if the detail is taken out of Policy CB6 which deals with the mechanics of equalisation, this would

- lead to duplication elsewhere, e.g. the open space standards which have to be introduced for each allocation
- result in confusion over which infrastructure components and land uses can be equalised and which are simply area specific e.g., gypsy and traveller provision, engine testing and serviced land for a parsonage.
- Require greater reading of the plan as a whole to ensure that such obligations as the need for EV ducting and the need for contributions to town centre infrastructure are not missed by future proposals/developers

Following the decoupling of the CIDP and policy (which we support) we do believe that there is a need to retain the detail within CB6 otherwise at application stage there is a greater risk of much debate between the Council and each respective development/expansion area as to what should

go into the mix. For a phase of Cranbrook's expansion when we are not dealing with a single consortium but instead a range of developers/promoters on each of the separate allocations, the greater the certainty that we can bring to policy expectations the better.

We noted your previous advice about site specific requirements being identified within Policies CB2 – CB5 and have tried to ensure that as allocation policies, these capture site specific requirements. If there are any that you consider that we have missed we would be very happy to correct this.

We note your request to publish proposed modifications to Policies CB2 – CB7 and provide an extract from our schedule for these policies with this letter.

We hope that this letter addresses your current queries and is of assistance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J Brown', with a horizontal line underneath the name.

James Brown
New Community Officer Cranbrook
