

Planning, Transportation and Environment

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16th February 2022

Sent via email to

plancranbrook@eastdevon.gov.uk

Dear Mr Brown

Consultation on the Cranbrook Plan Schedule of proposed main modifications Rev. 8 (January 2022)

Thank you for the opportunity to comment on the schedule of proposed main modifications for the Cranbrook Plan. Overall, Devon County Council is very supportive of the development plan objectives and policies. We note that issues raised in the county council's response to the Submission Draft plan, the council's representations to the Cranbrook Plan Examination and in ongoing informal discussions between our authorities have been addressed including relating to transport and highways, education provision, public health, flood risk management and the historic environment.

Devon County Council considers the Cranbrook Plan complies with the duty to co-operate. The county council has worked closely with East Devon District Council throughout the preparation of the plan including providing advice, attendance of meetings, preparation of evidence reports and submission of formal representations. This approach has drawn on the expertise of a number of county officers from various service areas including education, transportation, public health, flood risk, waste management, gypsy and travellers, adult, children's, youth and libraries. From Devon County Council's perspective, the council now views the plan to be sound and legally compliant.

As you can see Devon County Council is providing our response to your consultation within this letter, with Appendix A of this letter providing the details required for Part A of your Representation Form and Appendix B of this letter providing the county council's comments on the proposed modifications which are relevant to the council's services and interests (instead of your Part B Representation Forms). This response should be read alongside previous statements submitted by DCC for the Cranbrook Plan Examination and for previous plan consultations.

Devon County Council strongly endorses the plan's objectives and policies to deliver a healthy and sustainable new town. The council considers it essential that important infrastructure at Cranbrook is delivered in an appropriately phased and timely manner providing sustainable transport infrastructure and essential community facilities and services. As such, the council welcomes the proposed provision of infrastructure at Cranbrook as identified in the Cranbrook Plan proposed main modifications along with contributions as specified in the associated Cranbrook Infrastructure Delivery Plan June 2021.

Whilst not proposed as a main modification, the district council has previously identified a possible additional saving from the Cranbrook Infrastructure Delivery Plan in part by reducing the Public Transport contribution by £2,380,000 (PSD 34 page 3 and PSD 42 page 3). Devon County Council would like to reiterate our previous comments on this matter in our response statement to the consultation on additional viability documents dated 18th August 2021 (PSD 44B). In summary, DCC would prefer this saving not to be made and considers it important to retain the full Public Transport contribution identified in the Cranbrook Infrastructure Delivery Plan June 2021 in order to increase the bus service to a 10 minute day-time frequency providing more service capacity and route options as detailed in PSD 44B.

If you or the Inspector have any queries about the matters raised in this response, please do not hesitate to contact the county council.

Yours sincerely,



Mike Deaton
Chief Planner

Appendix A

Personal Details required for Part A of EDDC's Representation Form

Title	Mr
First Name	Mike
Last Name	Deaton
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DCC wishes to be notified of the adoption of the Cranbrook Plan

Appendix B: Schedule of DCC comments on the Cranbrook Plan Schedule of proposed main modifications Rev. 8 (January 2022)

PMM number	Legally compliant?	Sound?	DCC comments on proposed main modification	Further modification requested?
MM 3	Y	Y	<p>Policy list number 2 - Hot Food Takeaways: DCC supports this main modification (MM) which introduces mirror wording about hot food takeaways into the Bluehayes policy, addresses the changes in the Use Class Order and ensures that the policies reflect relevant sections of the NPPF and NPPG relating to healthy and safe communities; Public Health England February 2020 guidance on using the planning system to promote healthy weight environments¹; and NICE guidance on cardiovascular disease prevention (recommendation 11)².</p> <p>Policy list number 4 - Primary School provision: We support this MM which provides further flexibility over the delivery and phasing of the new primary schools (with new wording allowing provision of the school land and a financial contribution), and clarity over the expectations for each expansion area relating to education infrastructure (including for the 2 delivery options).</p> <p>Policy list number 6 - Financial contributions: New wording welcomed to provide clarity over the financial contributions expected for this expansion area.</p> <p>Policy list number 7 - Contributions for London Road: New wording supported to provide clarity over the contributions expected for this expansion area towards London Road improvements.</p>	N

¹ Public Health England guidance dated 7.2.20: Using the planning system to promote healthy weight environments – Guidance and supplementary planning document template for local authority public health and planning teams.

Available at: [Healthy weight environments: using the planning system - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/healthy-weight-environments-using-the-planning-system)

² NICE guidance published 22.10.10: Cardiovascular disease prevention (Publish health guidance PH25): Recommendation 11.

Available at: [1 Recommendations | Cardiovascular disease prevention | Guidance | NICE](https://www.nice.org.uk/guidance/PH25/recommendation-11)

			<p>last paragraph - Bluehayes access: DCC supports this modification controlling access to the Coachfield House land, thereby addressing previous highways concerns.</p>	
MM 5	Y	Y	<p>Policy list number 2 - Hot Food Takeaways: DCC supports this MM which address the changes in the Use Class Order and ensures that the policies reflect relevant sections of the NPPF and NPPG relating to healthy and safe communities; Public Health England February 2020 guidance on using the planning system to promote healthy weight environments; and NICE guidance on cardiovascular disease prevention (recommendation 11).</p> <p>Policy list number 3 - Primary School provision: We support this MM which provides further flexibility over the delivery and phasing of the new primary schools (with new wording allowing provision of the school land and a financial contribution), and clarity over the expectations for each expansion area relating to education infrastructure (including for the 2 delivery options).</p> <p>Policy list number 7- Gypsy & Travellers: This MM is supported which is more precise about the role of the allocation and policies plan</p> <p>Policy list number 9 - Financial contributions: New wording welcomed to provide clarity over the financial contributions expected for this expansion area.</p>	N
MM 6	Y	Y	<p>Policy list number 2 - Hot Food Takeaways: DCC supports this MM which address the changes in the Use Class Order and ensures that the policies reflect relevant sections of the NPPF and NPPG relating to healthy and safe communities; Public Health England February 2020 guidance on using the planning system to promote healthy weight environments; and NICE guidance on cardiovascular disease prevention (recommendation 11).</p> <p>Policy list number 3 - Primary School provision:</p>	N

			<p>We support this MM which provides further flexibility over the delivery and phasing of the new primary schools (with new wording allowing provision of the school land and a financial contribution), and clarity over the expectations for each expansion area relating to education infrastructure (including for the 2 delivery options).</p> <p>Policy list number 4 - Special Educational Needs: DCC welcomes the clarity provided by this modification.</p> <p>Policy list number 7 - Gypsy & Travellers: This MM is supported which is more precise about the role of the allocation and policies plan.</p> <p>Policy list number 10 - Financial contributions: New wording welcomed to provide clarity over the financial contributions expected for this expansion area.</p> <p>Policy list number 11 - Contributions for London Road: New wording supported to provide clarity over the contributions expected for this expansion area towards London Road improvements.</p>	
MM 8	Y	Y	<p>Policy list number 2 - Hot Food Takeaways: DCC supports this MM which address the changes in the Use Class Order and ensures that the policies reflect relevant sections of the NPPF and NPPG relating to healthy and safe communities; Public Health England February 2020 guidance on using the planning system to promote healthy weight environments; and NICE guidance on cardiovascular disease prevention (recommendation 11).</p> <p>Policy list number 4 - Financial contributions: New wording welcomed to provide clarity over the financial contributions expected for this expansion area.</p> <p>Policy list number 5 - Contributions for London Road: New wording supported to provide clarity over the contributions expected for this expansion area towards London Road improvements.</p>	N

MM 9	Y	Y	<p>Infrastructure categories & items: DCC supports specifying the infrastructure items falling within each of the four categories. DCC endorses the clarity that including this wording within CB6 provides to all parties. DCC has previously provided considerable justification for the planning need and costings for the specified DCC-related infrastructure, in particular in PSD13 and PSD26.</p>	N
MM 10	Y	Y	<p>Infrastructure categories & items: DCC supports the clarity provided by the MM10 list of items not suitable for equalisation.</p>	N
MM 11	Y	Y	<p>Phasing strategies: DCC welcomes the requirement for a phasing strategy as part of an outline or detailed planning application.</p> <p>PS phasing & delivery: We support this MM which provides further flexibility over the delivery and phasing of the new primary schools, and clarity over the expectations for each expansion area relating to education infrastructure. This MM provides simplified wording for the policy whilst retaining the essential requirements of the previous version (June 2021 Submission Draft with proposed main modifications). Inclusion of wording about step in rights is supported. This MM reflects relevant Government guidance³ and DCC's Education Approach for Developer Contributions (December 2021)⁴.</p>	N
MM 12	Y	Y	<p>PS phasing & delivery: DCC supports this MM which provides a safeguarding mechanism along with further flexibility over the delivery and phasing of the new primary schools plus clarity over the expectations for each expansion area relating to education infrastructure, and the preferred order and location of school delivery.</p>	N

³ Department for Education guidance dated November 2019: Securing developer contributions for education. Available at: [Securing developer contributions for education \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

⁴ Devon County Council. Education Approach for Developer Contributions. Dated December 2021. Available at: [Pupil place planning - Planning \(devon.gov.uk\)](https://devon.gov.uk) (under the 'Policy Documents' heading at the bottom of the webpage)

MM 13	Y	Y	<p>Public transport: DCC endorses combining CB10 and CB9 into a revised CB9, including the introduction of the new policy sentence which we had previously requested as supporting text in June 2021 (stating “Safeguarding of land for a second station supports the longer term ambition to deliver a second station at Cranbrook. It is envisaged that this would require Government/third party funding to deliver”).</p>	N
MM 14	Y	Y	<p>Station land: We support combining CB10 and CB9 into a revised CB9, as per the comment for MM13 above.</p>	N
MM 23	Y	Y	<p>Design Codes: DCC endorses the modifications to this policy which will support environmental, health and social objectives. New text supported including reference to the National Design Guide and Building for a Healthy Life, and amended text for list points 2, 9, 10 and 11 supporting active travel, healthy streets and lifestyles, green and blue infrastructure with consideration of water management.</p>	N
MM 24	Y	Y	<p>Paras 4.6 & 4.9 - Masterplan approach & Building for Healthy Life: DCC welcomes revised wording promoting accessibility and legibility to allow for a mix of travel modes and endorses the Building for Healthy Life principles.</p>	N
MM 25	Y	Y	<p>Walking and cycling & Travel plans: New text supported promoting enhanced walking and cycling opportunities to help deliver sustainability and health benefits. Amended text welcomed making clear the requirement for individual travel plans for new employment or residential developments.</p>	N
MM 26	Y	Y	<p>Cycle parking: DCC supports the inclusion of this cycle parking standard within the policy rather than as supporting text.</p>	N
MM 27	Y	Y	<p>Paras 4.42 – 4.44: parking:</p>	N

			New text supported indicating parking requirements, including reference to a potential parking SPD document and expected standards in the absence of an SPD.	
MM 28	Y		<p>Town Centre Extra Care Housing: DCC endorses the new text for ECH specifying a minimum of 55 beds.</p> <p>Hot Food Takeaways: We support this MM which address the changes in the Use Class Order and ensures that the policies reflect relevant sections of the NPPF and NPPG relating to healthy and safe communities; Public Health England February 2020 guidance on using the planning system to promote healthy weight environments; and NICE guidance on cardiovascular disease prevention (recommendation 11).</p>	N
MM 30	Y	Y	<p>Contributions: DCC supports the requirement for contributions for infrastructure to mitigate for the pressure arising from additional residential development.</p>	N
MM 31	Y	Y	<p>London Road - Hot Food Takeaways: We support this MM which address the changes in the Use Class Order and ensures that the policies reflect relevant sections of the NPPF and NPPG relating to healthy and safe communities; Public Health England February 2020 guidance on using the planning system to promote healthy weight environments; and NICE guidance on cardiovascular disease prevention (recommendation 11).</p>	N
MM 32	Y	Y	<p>Para 4.69 - London Road Pedestrian bridge: DCC is content with MM32 and the associated change to omit the Treasbeare Bluehayes Bridge from the IDP (PSD 35, pdf page 42, item 52), leaving a residual budget of £500,000 for an enhanced at-grade pedestrian crossing.</p>	N
PMS 9	Y	Y	<p>Cobdens Education land: DCC accepts the removal of identified education land from the Cobdens Expansion allocation in order to allow greater flexibility. The education land must be located in a highly accessible location close to the neighbourhood centre (within 500 metres) and in a location which allows delivery in accordance the phasing requirements of Policy CB7.</p>	N