

# Cranbrook Plan –

## Proposed Main Modifications Consultation



17 January 2022 to 28 February 2022 closing at 5pm

|                 |
|-----------------|
| For Office Ref: |
|                 |

### Representation Form - to be used as an additional part B form

Please email the completed forms to: [plancranbrook@eastdevon.gov.uk](mailto:plancranbrook@eastdevon.gov.uk)

Alternatively, you can post your completed form to: The Cranbrook Plan, Planning Policy, East Devon District Council, Blackdown House, Border Road, Heathpark Industrial Estate, Honiton, EX14 1EJ

### Part B – Your representations continued

Please use this 'Part B only' form for the **second and subsequent** proposed Main modifications **or** documents that you wish to comment on. It must only be used in conjunction with an **accompanying combined Part A and B** form.

|                             |                   |
|-----------------------------|-------------------|
| <b>Name or Organisation</b> | Bell Cornwell LLP |
|-----------------------------|-------------------|

1. To which part of the Cranbrook Plan does this representation relate?  
(Please identify only one reference per Part B form)

|                                  |       |                             |                                       |                               |                                                              |
|----------------------------------|-------|-----------------------------|---------------------------------------|-------------------------------|--------------------------------------------------------------|
| Proposed Main Modification (PMM) | MM 11 | Policies Map Schedule (PMS) | Please select from the dropdown list. | Sustainability Appraisal (SA) | Select if commenting on the SA.<br>Ref: Click to enter text. |
|----------------------------------|-------|-----------------------------|---------------------------------------|-------------------------------|--------------------------------------------------------------|

2. If commenting on the PMMs, do you consider that with their incorporation, the Cranbrook Plan is:

|                                          |                                                                                                                                      |
|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| (a) Legally compliant                    | Yes                                                                                                                                  |
| If answering 'No' please provide reasons | Click to enter text.                                                                                                                 |
| (b) Sound                                | No                                                                                                                                   |
| If answering 'No' please provide reasons | The policy approach is not justified - it does not provide an appropriate strategy for the delivery of, or phasing of education, and |

in association the delivery of housing, considering the reasonable alternatives available to the LPA and DCC, and based on proportionate evidence submitted with this representation.

For Office Ref:

3. Please provide full details of your comments in respect of the Modification that you have identified and be as precise and succinct as possible.

The policy approach is not justified - it does not provide an appropriate strategy for the delivery of or phasing of education, considering the reasonable alternatives available to the LPA and DCC, and based on proportionate evidence submitted with this representation. Given our findings on this issue we would request that this issue is considered at further Hearing Sessions.

We also note that EDDC has, in the last week, provided a new monitoring report in Feb 2022 and that the projected delivery in this document would now present DCC with the opportunity of updating its school forecasts to help inform decision-making moving forward and the triggers for primary school delivery. This updated information should be taken into account by DCC and their position set out given the late availability of this information in this consultation process. The timing of this information also seems unreasonable as it has resulted in a degree of abortive work for our consultant team.

Finally, to support this representation, Cranbrook LVA have appointed EHP Consultants, to prepare the EHP Primary Education Impact & Mitigation Assessment (the 'EHP report' thereafter). This demonstrates the approach being taken with the phasing of education is not justified. We would refer both the LPA and the Inspector to this document enclosed with our submission.

#### **Recent Strategic Planning Committee Papers**

Housing delivery in Cranbrook is at risk. The latest monitoring report published in February 2022 confirms that no houses are anticipated to be delivered across the expansion areas for the periods 21/22, 22/23 and 23/24, with 135 and 260 houses projected for 24/25 and 25/26 respectively. This could very well be an underestimation of the situation.

See page 19 of the following link:

<https://democracy.eastdevon.gov.uk/documents/s15291/1a.%20HMU%20to%20year%20end%2031%20March%202021%20FEB%202022.pdf>

Furthermore, at EDDC's last Strategic Planning Committee meeting (22/02/2022) on page 48 paragraphs 5.1 and 5.2 of the office report provide commentary on the LPA's current housing land supply position and set out (see link:

<https://democracy.eastdevon.gov.uk/documents/g1864/Public%20reports%20pack%2022nd-Feb-2022%2009.30%20Strategic%20Planning%20Committee.pdf?T=10> ) it as confirmed that:

*"5.1 Members are advised that despite being able to demonstrate a 5 year housing land supply position for the 2020/21 monitoring period the position does not look so positive when we look ahead beyond the next 5 years. The projected delivery for 2025-26 onwards falls significantly below the current baseline requirement of 918. This is particularly concerning as this figure is subject to change and a 5% buffer is also applied. The delivery projections are at further risk due to their reliance on the timely delivery of the*

*Cranbrook expansion areas albeit it is anticipated that the Cranbrook Plan can soon be adopted and these can move forward quickly. The removal of the Axminster Urban Extension from the supply projections has also hurt the position. There is a need to unlock the urban extension or find alternative sites that can deliver homes quickly to bolster the housing land supply position if the current position is to be maintained in future years.*

*5.2 Work is progressing on a new Local Plan which will allocate further sites but it is unlikely to be adopted before 2024 at the earliest and so we are still a few years away from these being able to count towards our housing land supply position. In any event many of these sites may not deliver early in the plan period. This leaves a gap in supply which will need to be filled. Fundamentally this can only be achieved by granting residential consents for sites that can deliver homes in the short to medium term. In order to bolster supply beyond those sites that may ordinarily come forward Members may wish to consider whether sites that do not fit with the currently adopted strategy for growth but where no substantial harm would arise and the development is sustainable should be viewed favourably even where it does not accord with the Local Plan. Officers will advise Planning Committee where it is considered that such an approach should be adopted so that the implications of potentially finely balanced decisions on housing land supply can be fully understood and considered.”*

*This position is concerning for the Cranbrook Plan as EDDC are suggesting they will need to approve sites which are not allocated or in accordance with the development plan, when they have land at Cranbrook which is capable of providing much needed housing delivery. In this regard, the LPA should be doing all they can to deliver housing at Cranbrook and this could be achieved in part by a less restrictive approach to the phasing of education.*

### **Housing Delivery**

The Council’s 5 year housing land supply position is at risk, and the housing monitoring report suggests it is going to be some time before housing comes forward in the expansion areas. Therefore, the current phasing of education which restricts only 30 dwellings coming forward across the whole town before a primary school is delivered needs to be amended to facilitate much needed housing delivery.

Also, as things stand, the current phasing for education means the timeline set out above may not be possible, and it puts the delivery of the Farlands site (and other small sites) in the hands of other parties. This cannot be deemed satisfactory by the Council. Action is therefore urgently required in order to ensure that policy is written which helps to stimulate development rather than hinder it.

There is also a real danger that development will be complete within the existing approved Cranbrook scheme before development has a chance to start within the expansion areas. This hiatus and lack of continuity will be very harmful to the Council’s housing land supply and for the developers who are already delivering housing in the town. Again, we would urge the Council to take proactive action which we understand officers would be open to taking, if the Inspector were to request a different approach.

As drafted, the proposed phasing of education essentially puts our client (and other small-scale developers) into a form of ransom whereby ‘Lead Developers’ are able to dictate when other parties (including Cranbrook LVA) can deliver necessary housing. It does seem risky to put housing delivery in the hands of a few parties, when sites like Farlands can make an essential contribution to housing delivery, and also bring new developers and design variation to the town. Ultimately, other Lead Developers may not wish to deliver housing in the Cranbrook Expansion Land’s at the rate which the LPA desires.

We know there is scope for flexibility on this issue. We also know that East Devon and Devon County have previously looked at interim solutions such as temporary classrooms as an acceptable solution in

the short-term absence of a new school to accommodate the needs of children arising from early new housing developments within the strategic areas of the district.

One such example was at Broadclyst Community Primary, where applications 18/0403/FUL, 18/0461/FUL, 18/0463/FUL all sought to retain/provide temporary accommodation to meet a growth in population whilst the construction of a permanent new school was awaited. The officer justification for supporting these applications acknowledges the accommodation was required for all the reasons we have previously discussed in our meetings. Further details are provided in the attached documents which illustrate this example.

### **Principle of using temporary Accommodation as an interim solution**

It has previously been suggested by both EDDC and DCC that the use of temporary accommodation would not be suitable because it would provide a poor standard of teaching accommodation. In this regard, we would refer you to the conclusions set out in the attached 'EHP report' (paragraph 1.6.6) which confirms that current DfE guidance suggests the use of modular or temporary classrooms or temporary expansions to existing schools, when necessary, in order to ensure that the local education authority is able to meet its statutory requirements.

Therefore to suggest this is not an appropriate solution is simply not accurate. The use of temporary accommodation is an accepted approach supported by the Department of Education and can clearly be used in Cranbrook. EHP would strongly disagree with this assertion on the basis of detailed evidence they have found and we would refer Officers and the Inspector to the following sections of the 'EHP report':

“5.2.27. Firstly, DCC would clearly not be following the current DfE guidance regarding the valid use of modular or temporary classrooms, as set out earlier in this Assessment.

5.2.28. Secondly, DCC would not be giving due regard to the success in the use of temporary classrooms in other local education authorities. There is a relevant example elsewhere where the local education authority and local planning authority both agreed to the provision of primary school capacity in modular classrooms when additional local places were required and the date when permanent primary school capacity would be created was not yet known. We would refer you to the example set out at paragraph 5.2.29 where, whilst having provided education in modular classrooms on its temporary site for 3 years, The Heights Primary School (Reading) received an Ofsted rating of “Outstanding” [source: The Heights Primary School details on the DfE [website](#)]. It is clearly possible to deliver outstanding education in modular classrooms over a prolonged period.

5.2.33. Thirdly, DCC would not be giving due regard to its own approach to the use of temporary classrooms at other school sites elsewhere in Devon for periods up to 15 years. For example:

[DCC/4113/2019](#) - Retention of the existing modular classroom block (02) for 15 years; Stokenham County Primary School, Coleridge Cross TQ7 2SJ.

[DCC/3981/2017](#) - Retention of 2 temporary classroom units (Blocks 02 and 03) for a further 8 years; Whitchurch Primary School, Whitchurch, PL19 9SR.

[DCC/3966/2017](#) – Retention of Temporary Classroom for a further ten years; Bridestowe Primary School, Bridestowe EX20 4EL.

5.2.34. DCC would also not be giving due regard to the approach that it adopted locally regarding the provision of temporary accommodation at Broadclyst Primary School while a new school was being constructed at West Clyst (planning application [18/0403/FUL](#)). Further details of this permission are also provided as a separate appendix document.

It is evidence from the information provided that DCC have fully supported the use of temporary classrooms.

## Possible locations for the use of temporary Accommodation

We would refer officers and the Inspector to paragraph 5.2.11. and 5.2.12. of the 'EHP report' where it states:

"5.2.11. Within these written representations on the Cranbrook Infrastructure Delivery Plan DCC also stated as follows (with our emphases):

*"The Cranbrook School Capacity Assessment contained in Appendix 2 of this document demonstrates that existing schools at Cranbrook and nearby will not have capacity to service the expansion area development. In addition, letters from the Ted Wragg Trust and the Diocese of Exeter in Appendices 3 and 4 state that they cannot accommodate additional pupil numbers at their school sites on a temporary or permanent basis."*

[Source: DCC - Position Statement - Additional information on Cranbrook Infrastructure Delivery Plan - page 8, at Appendix EHP17]

5.2.12. The latter part of the above statement differs very significantly from the position that DCC set out 1 month earlier on 8th January 2020 regarding Matter 9: Infrastructure Delivery within its written representations during the Cranbrook Plan 2013-2031 Examination (with our emphasis):

**5. Q133: How will the increased demand for school places arising from the development be accommodated prior to the completion of the new school? How will this impact on surrounding schools (particularly Whimble Primary School)?**

5.1.1. The trigger for the new primary school is very early on within the development phasing and therefore only a small number of additional pupils will be generated from the development before the school opens.

5.1.2. There will be an opportunity to provide temporary accommodation in advance of the permanent new school buildings opening and this is an approach which has been followed recently at a number of new primary school across the county, including Monkerton (in Exeter) and Kingsteignton. This approach can be followed when there is certainty that the new school will open within a reasonable timeframe. There is extensive land available at the Cranbrook Education Campus and as such there is potential that such a solution could be provided there.

Source: DCC - Position Statement - Matter 9: Infrastructure Delivery - Cranbrook Plan 2013-2031 Examination page 4, at Appendix EHP18]"

Clearly, in January 2020 DCC were of the view that there is an opportunity to deliver temporary accommodation in advance of permanent new school buildings opening and this is an approach which has been followed recently at a number of new primary schools across the county. They also confirm that (with our underlining and emphasis), "This approach can be followed when there is certainty that the new school will open within a reasonable timeframe. There is extensive land available at the Cranbrook Education and as such there is potential that such a solution could be provided there. The use of temporary accommodation in Cranbrook could therefore be supported and included in the policy as an option.

It is EHP's view, that this temporary accommodation, could be directed toward the Cranbrook Education Campus at the Ted Wragg Multi-Academy Trust (TWMAT), despite suggestions from DCC that they cannot accommodate additional pupil numbers in their response to the Cranbrook Infrastructure Delivery Plan. This differs from the position set out in DCC's earlier January 2020 comments.

EHP (at paragraph 5.2.15 and 5.2.16 of their report) advise that DCC are the owners of the land on which Cranbrook Education Campus is located and on this basis, whilst TWMAT would be consulted, it would be for DCC to assess whether modular or temporary classrooms could be located on land at Cranbrook Education Campus and as indicated in the DCC Position Statement cited earlier *“There is extensive land available at the Cranbrook Education Campus and as such there is potential that such a solution could be provided there.”*

Moreover, at paragraph 5.2.17 EHP advise that *“...if the Ted Wragg Multi-Academy Trust were to object to modular or temporary classrooms being located on land at Cranbrook Education Campus, any such objection would not trump the need for DCC to meet its statutory duty to secure sufficient school places.”*

We would then draw the Inspector’s attention to paragraph 5.2.18, 5.2.19 and 5.2.20 of the report which we quote directly below:

*“5.2.18. Furthermore, in our opinion, whilst DCC states that the letter from the Ted Wragg Multi-Academy Trust states *“that they cannot accommodate additional pupil numbers at their school sites on a temporary or permanent basis”*, this statement is incorrect.*

*5.2.19. The letter from the Ted Wragg Multi-Academy Trust does not state that modular or temporary classrooms cannot be located on land at Cranbrook Education Campus; the letter solely refers to using the existing school buildings to provide additional primary school places or adding further permanent primary school capacity.*

*5.2.20. Furthermore, the letter from the Ted Wragg Multi-Academy Trust appears to wholly contradict the details regarding the recent ground floor expansion option at the school which was chosen to enable potential further expansion at first floor level, as set out earlier in this Assessment...”*

We would also refer officers and the Inspector to the Appendix 10 of the EHP report which is the Design & Access Statement for planning application 19/0133/FUL which proposed the erection of a single storey extension to the west wing of the existing building, to deliver 2no. additional classrooms at the TWMAT Cranbrook Education Campus. Section 3 of the DAS provides a series of options that show the school could also be extended through first floor additions and a modular style building within the grounds of the school. Therefore, despite the position above, as recently as 2019 a series of options to extend the school were explored and the ground floor expansion option at the TWMAT Campus was chosen in order to facilitate a potential further expansion of the primary school at first floor level.

Given the position set out at Paragraph 5.2.22 of the ‘EHP report’, EHP are clear that DCC has not set out robust evidence that temporary primary school capacity or additional permanent primary school capacity cannot be provided on land at Cranbrook Education Campus. Furthermore, in EHP’s opinion, DCC’s comments regarding the option for the provision of additional primary school places in temporary accommodation do not go far enough to set out the potential options available to DCC. In EHP’s opinion, the *“opportunity”* of providing temporary accommodation does not require certainty of the date when the new school would open. DCC are capable of providing temporary accommodation even if the date when the new school would open is not yet known. In fact, in order to meet its statutory duty as set out earlier in this Assessment, DCC may have no choice but to take this option if a new school does not open in permanent accommodation in the foreseeable future (our underlining and emphasis).

## **Mitigation Required and Delivery of Schools**

EHP have advised that the current main modifications proposed by EDDC to the Development Plan Document of the Cranbrook Plan states as follows (with our emphases):

*“3.14 Owing to the lack of existing capacity that exists within the education system locally, Devon County Council have advised that they would expect a primary school to be delivered alongside the first phase of any residential development”*

and within MM11 of the same document EDDC also states:

*“School land as required by Policies CB2 – CB4 (for Bluehayes, Treasbeare and Cobdens) shall be identified before planning permission is first granted for development in each of these three expansion areas. The land must be secured through appropriate legal agreements with access and step in rights included. Delivery can be made either through direct delivery by developers or by the Local Education Authority (LEA) / school provider (SP) where there is secured developer funding (including where necessary appropriate bonds) for that school.*

*Where the delivery is by the LEA/SP, then for the first school the secured land must be transferred, with construction access, prior to the commencement of any dwelling\*, while for the second school the land should be similarly transferred by the 750th dwelling\*. Subsequent servicing of the sites by the developer must be completed prior to occupation of the first dwelling\* for the first school, and prior to occupation of the 750th dwelling\* for the second school.*

*Where delivery is by the developer then the first primary school must be delivered before the first occupation of the 30th dwelling\*. The second primary school must be delivered before the first occupation of the 1650th dwelling\* in the event that the 420 place primary school is delivered first or the 2500th dwelling\* in the event that the 630 place primary school is delivered first. Once school land has been transferred or School delivery (if by direct delivery) has occurred in either the Bluehayes or Treasbeare expansion area the residual site within the other of these two areas can be released for alternative uses.*

*\* = trigger point to be assessed across all 4 expansion areas”*

[Source: Main modifications proposed by EDDC to the Development Plan Document of the Cranbrook Plan pages 24 and 49, at Appendix EHP25]

The current approach indicates that EDDC appear to be choosing to prioritise securing permanent primary school capacity on one of three expansion areas rather than ensuring housing delivery for the area.

However, as per paragraph 5.3.3 of the ‘EHP report’, on the basis of the analyses and observations made within this Assessment there are aspects of the EDDC requests above which are either flawed, or not supported by evidence, or both.

EHP are of the view that DCC has provided neither sufficient nor robust evidence in order for EDDC to justify the trigger points set out in policy (e.g. that a school must be delivered before the 30<sup>th</sup> dwelling) in MM11 of the Main Modifications to the Cranbrook DPD:

Secondly, if evidence is indeed provided by DCC at a later date that *“the first primary school must be delivered before the first occupation of the 30th dwelling”* and if a school site is not acquired on one of the three expansions areas cited earlier then in order to meet its statutory duty to secure sufficient school places DCC may need to either:

A. provide modular or temporary primary school accommodation until a new school opens, and/or

B. ensure that another primary school site is acquired by DCC such that the new school can open on another site outside of the 3 expansion areas of Bluehayes, Treasbeare or Cobdens.

At paragraph 5.3.6. of the 'EHP report', EHP confirm that DCC are suggesting the need for a new school in the Cranbrook area is not solely driven by dwellings coming forward on the 4 expansion areas of Bluehayes, Treasbeare, Grange or Cobdens. According to DCC it would appear that the early requirement for the first additional new primary school is due to an existing, known and defined pressure for places due to the following factors:

#### 4. CONCLUSION

There is a clear need for the early delivery of primary school buildings in Cranbrook due to the higher than average birth rates and high pupil yields from new housing. Therefore, there is a need to secure the primary school provision very early in the proposed expansion area firstly to ensure sufficient pupil places but also to facilitate the procurement of a school sponsor to operate the new school.

[Source: DCC - Position Statement - Additional information on Cranbrook Infrastructure Delivery Plan - Appendix 2: Cranbrook Education Capacity Assessment page 4, at Appendix EHP17]

With regard to 'A' above, as set out earlier in this Assessment, 3 local primary schools are unlikely to be able to provide sufficient space for temporary accommodation. However, modular or temporary classrooms could be located on land at Cranbrook Education Campus, as indicated in the DCC Position Statement cited earlier *"There is extensive land available at the Cranbrook Education Campus and as such there is potential that such a solution could be provided there."*

Furthermore, contrary to DCC's comments in February 2020 which rely solely on a letter from Ted Wragg Multi-Academy Trust, DCC has not set out robust evidence that temporary primary school capacity cannot be provided on land at Cranbrook Education Campus.

We would then refer officer to paragraph 5.3.9 to 5.3.14 of the 'EHP report' which is provided below:

5.3.9. With regard to 'B' above, if there are further delays to one of the 4 expansion areas of Bluehayes, Treasbeare, Grange or Cobdens being approved, or if one of these sites is approved but does not build more than 29 dwellings and hence trigger the delivery of a new primary school on-site, DCC will still need to provide additional primary school capacity in the Cranbrook area.

5.3.10. It is evident that DCC will consider buying land for a new school site if necessary. The current DCC Education Infrastructure Plan (revised) states as follows (with our emphasises):

*"Securing school sites...*

*In some cases, Devon County Council may purchase a school site in advance of development coming forward. This however will be on the basis that all future development makes a contribution to reimburse the Education Authority proportional to the size of development and the cost of land."*

[Source: DCC Education Infrastructure Plan (revised) Page 64 Appendix C, at Appendix EHP12]

5.3.11. DCC has not set out any evidence as to why this other option cannot be pursued locally, if necessary.

5.3.12. On the above basis in our opinion there is currently no evidence that has been presented thus far by DCC or EDDC which enables EDDC to justify its following request within MM11 of the Main Modifications to the Cranbrook DPD:

*"School land as required by Policies CB2 – CB4 (for Bluehayes, Treasbeare and Cobdens) shall be identified before planning permission is first granted for development in each of these three expansion areas."*

[Source: Main modifications proposed by EDDC to the Development Plan Document of the Cranbrook Plan page 49, at Appendix EHP25]

5.3.13. Rather than rely solely on a new school site at Bluehayes, Treasbeare or Cobdens as defined above, DCC can instead either:

A. provide modular or temporary primary school accommodation until the new school opens, and/or

B. ensure that another primary school site is acquired by DCC such that the new school can open on another site outside of the 3 expansion areas of Bluehayes, Treasbeare or Cobdens.

5.3.14. In our opinion, DCC has not yet set out evidence to EDDC which would discount these options even though these options are entirely feasible and would enable EDDC to still prioritise housing delivery for the area while DCC is still able to secure sufficient additional primary school capacity when it is necessary.

#### **CONCLUSION TO EDUCATION PHASING**

The work undertaken within the 'EHP report' demonstrates that the policy position is not justified and does represent a satisfactory approach to delivering housing or creating additional primary school places. It is in EDDC's interests to amend policy so that smaller sites, such as Farlands, can provide interim solutions that allow developers/landowners who don't have control of the primary school land to make their fair contribution toward the delivery of education through S106 payments and for temporary accommodation to be delivered whilst a primary school is being delivered elsewhere in the local area. Suggested modifications are listed below:

4. Please set out what modification(s) you consider necessary to make the "Cranbrook Plan Modifications" legally compliant or sound, having regard to the reference you have identified at Q1 above where this relates to soundness. You will need to say why this modification will make the Cranbrook Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

MM11...

The current policy could be amended so that the triggers currently set out could explicitly refer to 'Lead Developer' as the parties in-control of the primary school land. E.g. **If direct delivery is proposed by a Lead Developer** for the first school this must be completed in accordance with an agreed school phasing programme which ensures that at least the first full phase is completed and handed over to the LEA/SP before the first occupation of the 30th dwelling **constructed by a Lead Developer** when assessed across the four expansion areas

And/or an additional clause should be built in that allows for interim solutions to be considered. This could include:

**In the interests of housing delivery, sites being brought forward by non-Lead Developers will be excluded from the triggers set out above and allowed to come forward on an application by application basis, ensuring each development meets its own need, and provided sufficient financial**

|                                                                                                                                                                                                                                                                                           |  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| contributions and/or temporary interim solutions toward education are secured as part of respective S106 agreements for each planning application. This could include contributions toward the provision of modular or temporary primary school accommodation until the new school opens. |  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

*Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.*

**Representations by both post and email must be received by 5pm Monday 28 February 2022**

# Notes to accompany Representation Form

## General notes

The representation form and this accompanying guidance note is designed to help you comment on the Cranbrook Plan – Proposed main modifications.

Please return this representation form to East Devon District Council by 5pm Monday 28<sup>th</sup> February 2022. Representations received after this time will not be accepted. We cannot accept anonymous responses. If you wish to submit documentation in support of your representation it should be submitted in electronic format and be no larger than 5 MB in size to allow it to be uploaded to the Council's web site. Representations will be published on the council's website, including your name but contact details and signatures will be redacted.

## Procedural guidance

A supporting procedural guide has been produced by the Planning Inspectorate to provide practical advice on aspects of the examination of local plans. This can be found on their website at: [Procedure Guide for Local Plan Examinations - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/482822/Procedure-Guide-for-Local-Plan-Examinations-2018.pdf). It explains the different stages of examination, the roles of the various parties and specifically for this part of the process, the purpose of proposed main modifications (section 6).

## Data protection

Any personal information which you provide will be held and used by East Devon District Council in its continued progress of the Cranbrook Plan and may inform other planning policy work. All duly made representations will be forwarded to the Planning Inspectorate and specifically the appointed Inspector who is conducting the independent examination of the Cranbrook Plan. Your information may also be shared within East Devon District Council for the purpose of carrying out our lawful functions. Otherwise your personal information will not be disclosed to anybody outside East Devon District Council without your permission, unless there is a lawful reason to do so, for example disclosure is necessary for crime prevention or detection purposes. Your information will be held securely and will not be retained for any longer than is necessary. There are a number of rights available to you in relation to our use of your personal information, depending on the reason for processing. Further detail about our use of your personal information can be found in the relevant Privacy Notice which can be accessed at: [eddcc-privacy-notice.pdf \(eastdevon.gov.uk\)](http://eastdevon.gov.uk/eddcc-privacy-notice.pdf) Further detail about data protection more generally can be seen on our website: <http://eastdevon.gov.uk/privacy/>. The Planning Inspectorate with whom data is shared with for the purpose of this examination have issued their own Customer Privacy Notice which can be access at: [Customer Privacy Notice - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/482822/Procedure-Guide-for-Local-Plan-Examinations-2018.pdf).