

**CRANBROOK TOWN COUNCIL  
PLANNING COMMITTEE  
25TH FEBRUARY 2025**

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**East Devon Local Plan 2020-2042**

The Regulation 19 Local Plan Consultation is currently taking place until 9am on Monday 31st March 2025.

The consultation is hosted on [Have Your Say Today - East Devon Local Plan - Regulation 19 - Commonplace](#)

The [Regulation 19 Publication Draft](#) of the East Devon Local Plan 2020-2042, alongside an [Evidence Library](#) and [Key Diagram](#), are available via these links.

A [printer friendly / screen reader compatible version](#) of the plan is also available.

An online [interactive Policies Map](#) is also available, which is the definitive Policies Map; to aid plan users EDDC has also produced a series of inset maps in PDF format. (NOTE: The PDF inset map for Cranbrook is entitled “West End” and the relevant policies can be seen on the wider West End of the District plan).

This report will focus on aspects of the draft Local Plan insofar as they affect Cranbrook and specifically how the development of Cranbrook to date might assist in the future development of the second new community proposed in the Plan.

Members will be aware that the strategic development of Cranbrook is not specifically dealt with in the emerging Local Plan but will continue to respond to the Cranbrook Plan 2013-2031. However, a key strand of the draft Local Plan 2020-2042 is how the influence of developing Cranbrook will inform the delivery of the second new community. In the Foreword Cllr Todd Olive states:

***“The creation of a new community between the A30 and A3052—a significant part of this Plan ..... represents an opportunity to apply the lessons learned from Cranbrook, ensuring the new community is thoughtfully designed, sustainably developed, and well-integrated into the natural environment, with essential services and facilities in place from the outset”.***

It is widely acknowledged that there are lessons to be learnt from the Cranbrook delivery model but probably the most significant single factor was the creation (and removal) of the estate rent charge. It is probably fair to say that the Cranbrook experience proved that strategic development and public open space management through a rent charge arrangement does not work

With large corporations taking over smaller management companies, residents subject to a rent charge are experiencing high estate management costs and particularly substandard delivery. This was the experience in Cranbrook and remains the experience where estate management arrangements remain. There is enough evidence of this locally but the Town Council has been approached by a number of Town and Parish Councils from across the Country seeking advice and support to enable them to rid themselves of their own estate management company. It is also worth noting that Estate Rent charges are undemocratic and not subject to the same level of public audit as local authorities.

In making representations along the progress of this local plan the Town Council has raised this issue and urged EDDC to include specific provisions within the Plan to ensure that, in strategic developments over a stated size, provision is made to ensure that suitable public open space management arrangements are brought forward to prevent this issue recurring. There has been

resistance, but other planning authorities have successfully brought forward suitable provisions within their Plan.

**Strategic Policy WS01 - Development of a second new community east of Exeter. (page 49) -**

This is a proposed development of initially 8000 homes rising to 10000. - The development will include at least 254 hectares of open space as well as foot and cycle links, drainage and basins.

In addressing how this open space will be managed the Plan does no more than state that a ***“robust and sustainable new town wide stewardship vehicle and governance will be established early on in the planning process”***. The Plan goes on to state that the ***“Stewardship Strategy will be a key component and will form part of the allocation- wide Masterplan providing full details of a) the governance structure and methods of funding of the proposed stewardship vehicle, b) public spaces and community assets to be owned, managed and maintained by the proposed stewardship vehicle and c) an indicative programme for the establishment and operation of the proposed stewardship vehicle”***. That all sounds suspiciously like an estate rent charge.

Whilst public ownership of strategic community assets presents a challenge to Town and Parish Councils, the model delivered in Cranbrook since 2018 has not only proved to be manageable but has also proved to be successful, delivering services at a cost far less than the equivalent estate rent charges and at a proven quality far better than the Town experienced under the previous estate rent charge regime.

Public ownership delivers quality, but it also protects the community against profiteering corporate companies that charge considerable “administrative” costs before a blade of grass is cut and then deliver sub-standard short-cut services.

One issue that needs to be considered, most probably within the S106 agreement for the second new community, is a Community Governance Review at an early stage to provide that the new local administration is in place ahead of delivery on site. Otherwise, the new administration will find it very difficult to unravel an alternative estate management arrangement. once established. In Cranbrook the Town Council was created in 2015, four years after construction commenced and three years after the first occupations. The Town was fortunate in having the Consortium support in unraveling the rent charge that had been created. There is no guarantee that the developers delivering the second new community will be as helpful.

Whilst not a matter specifically for the Local Plan, the issue of how communities pay for services across the district does need to be addressed. With communities pre-Cranbrook sharing a low cost Council tax regime and those within the development at Cranbrook and later contributing to the District wide services but also paying locally for their own services, there is a wide disparity and unfairness that will grow unless it is addressed. Is devolution an opportunity to redistribute pre-Cranbrook responsibility to the remaining Towns and Parishes to level up the cost responsibility across the district?

Another point for the second new community is the problematic vision-led approach away from the use of the private motorcar in the absence of viable and accessible public transport. This approach is at risk of not allocating appropriate resources within the masterplan.

**The comment therefore to this consultation is that the Local Plan should include specific provisions to ensure that, in strategic development, management of large scale public open space remains in public ownership. Particularly in light of impending devolution and a move towards a two tier local government arrangement where the important role of Town and Parish Councils comes into sharp focus. The opportunity should also be taken to address the current disparity about how services are paid for across the whole District. In**

**addition, that the new second community administration is put in place at an early stage to ensure that it is available to offer a viable open space management option from the outset.**

Perhaps the second most important lesson from Cranbrook is the experience of bringing forward a new town through what has essentially been a private development. It is believed that this has been recognised by EDDC - too late for Cranbrook but not too late for the second new community.

The draft Local Plan does recognise this particular issue within Strategic Policy WS01 but delivery within an overarching “masterplan” and the formation of an “infrastructure delivery plan” does not address the fact that the costs of delivery still fall to the developers and that is dictated by viability. The creation of a development corporation is not mentioned within the plan.

**The comment therefore is that the Local Plan should include specific provision to ensure that the Local Planning Authority is in charge of the delivery of the second new community through the formation of a development corporation. The aim is to ensure that infrastructure is delivered effectively and on time. Whilst there are words to this effect in the Plan they are not underpinned by the presence of a governing body within the local authority that not only oversees delivery but drives it.**

As indicated above, Cranbrook will continue to develop under the adopted Cranbrook Plan. The Cranbrook Plan has an end date of 2031. The Local Plan indicates that a new plan will supersede it before then. New development at Cranbrook is outside the scope of the draft Local Plan 2020-2042 and therefore no sites for development within or adjoining Cranbrook are allocated in the Plan.

There are however selected policies in the draft local plan which are applicable to Cranbrook. Throughout the plan specific policies are mentioned as both “applying to the whole Plan area including the Cranbrook Plan” and “does not apply to the Cranbrook Plan area”.

**Strategic Policy SP04 - Employment provision. (Page 37).** 19.2 hectares of employment land are proposed within Cranbrook. This may include office use, research and development, general industrial use and storage and distribution. This provision for Cranbrook includes sites within the expansion areas as well as within the Cranbrook Plan area.

**Strategic Policy WS09 - Clyst Valley Regional Park - (page 65).** The Clyst Valley Regional Park will provide a network of green and blue infrastructure in the west of the district. This will provide a network of interconnecting walking and cycling opportunities, including the Country Park in Cranbrook. The plan will also seek to improve the ecology of the River Clyst and tributaries. This policy applies to Cranbrook.

**Strategic Policy CC01 - CC02 - CC03 - CC04 - CC05 - CC06 - Climate Change (page 107 et seq).** This part of the local plan sets out a range of measures relating to climate change, zero carbon development, low carbon and renewable energy, energy storage, heat networks and embodied carbon. The subsequent chapter (page 116) deals with adapting to climate change. No specific comments are recommended.

**Strategic Policy SE01 - Employment development within settlement boundaries (page 151) -** Provisions are brought forward to allow for development of employment sites. **This policy applies to the Cranbrook Plan area. The only comment regarding the Cranbrook Plan area is that proposals for Lodge Trading Estate (page 71) could have been more radical to redevelop the whole site for employment (or mixed use), remove the existing issue of HGV movements and, with the right quantum of development, provide parking on the north of the railway line and a footbridge link to the platform of the train station.**

Currently HGV movement to and from Lodge are the cause of considerable complaints from residents of Station Road in addition to the issue of highway obstruction due to the constraints of the rail bridge and the narrow roadway. Eventually the route will be via the Bluehayes expansion area and the movement of HGVs will not only impact on Station Road residents but equally those residing in the western expansion area of Cranbrook. To design a new settlement and immediately impact it with substantial level of known HGV traffic when the opportunity exists within the Local Plan to improve the situation for both existing and new residents is a missed opportunity.

**Strategic Policy SE06 - Town Centre hierarchy (page 159)** - This policy provides for preferred locations for town centre development in tier 1 and tier 2 town centres. Cranbrook is tier 2. Exmouth is the only Tier 1 town in East Devon.

Other strategies and policies have been reviewed and bring forward no matters that are recommended for specific comment during this consultation. The only other matter, not addressed in the plan, is the impact of devolution which is anticipated within three years from now and far earlier than the extent of the East Devon Local Plan 2020 - 2042. **With other Local Planning Authorities having local plans within Devon that are based upon differing strategies and policies, how is a new unitary council to manage these planning policy differences within a single unitary council planning authority once formed?**

### **Recommendation**

**That delegated authority be granted to the Deputy Clerk and Chair of the Planning Committee to respond to the Local Plan 2020-2042 regulation 19 consultation in terms of the comments above and any other comments brought forward by Planning Committee members.**