

East Devon District Council – Draft Local Plan 2040
FAO Policy Planning Team – East Devon District Council

Following the Meeting of the Planning Committee held on 5th December, members further considered the Town Council response to the Draft Local Plan at the meeting held on 19th December as set out in respective Minutes P/22/85 and P/22/94 below:

The Chairman advised that East Devon District Council are consulting on the draft Local Plan to 2040 and invited the Committee to consider the Town Council's response to the document. The Committee considered the report and the Town Council's response on behalf of Cranbrook, noting that the consultation period expired on 15th January 2023.

In summary, Cranbrook is not specifically addressed in this local plan. The Cranbrook plan was adopted in autumn 2022 and the Cranbrook Plan will oversee its development until this local plan and the Cranbrook Plan are superseded by a subsequent local plan that will follow that being consulted upon. It is proposed that the two plans (Local Plan to 2040 and the Cranbrook Plan) will operate in parallel.

Cranbrook is mentioned within the draft Local Plan but generally as an exception to the policies put forward.

Whilst development in Cranbrook does not feature in the consultation draft, the strategic direction of the Plan and its overriding spatial strategy is to focus new development on the western side of the district including a new town and other major strategic developments close to Exeter.

The Vision and Objectives of the Plan are outlined in Chapter 2 and seek to deliver better homes and communities, a greener East Devon and a resilient economy are a vision that we can all subscribe to.

Specific objectives include:

- designing for health and well being;
- tackling the climate emergency;
- meeting future housing needs;
- supporting jobs and the economy;
- promoting vibrant town centres;
- designing beautiful and healthy spaces and buildings;
- our outstanding built heritage and natural environment;
- promoting sustainable transport; and
- connections and infrastructure supporting sustainable and thriving villages.

The difficulty is that the plan is site led and stems from land that is put forward by land owners and developers for development. This approach to plan making (which is common to recent East Devon local plans) constrains strategic thinking and strategic development. The result is that the plan is parochial and, most likely, the response to it will be parochial.

One of the key issues with any local plan is housing numbers. These attract a degree of criticism and objection. In essence EDDC has no choice in this matter and is required to deliver the numbers dictated to it by Government. The issues raised by the plan therefore are not about housing numbers but more about housing allocation and the strategy within which it is delivered.

Given the scale of required development in the region, the approach of delivering a substantial percentage through a new settlement is probably the right way forward. The alternative is to add reasonably substantial additional housing to existing settlements and that approach would simply overrun existing infrastructure whilst not attracting the financial resources to improve it sufficiently.

The problem with the approach in the plan is two fold. Firstly it is not addressing the strategic infrastructure needs that will be required to underpin a new settlement on land to the south-east of Exeter and, secondly, it is not learning the lessons from the development of Cranbrook.

Given the current highway limitations and congestion around the A376 and A3052 there is a need to substantially improve the transport connectivity in that part of the District. One can have real sympathy with local residents living in that locality when they object to the development proposals (as they surely will) that are not properly underpinned with how the additional demands on infrastructure can be met. The highway infrastructure in that part of East Devon is already at or near capacity with lengthy delays at peak times. Existing public transport in that area is not a viable alternative to the car and that needs to be addressed. There is a distinct lack of vision to create a transport system around Exeter that is both efficient and affordable. Other European Cities manage it, why not here.

Clear collaboration with Exeter and its immediate travel to work area is required. It should be the starting point for this plan. Opportunities have been lost with the withdrawal from the work on the Greater Exeter Strategic Plan. This needs to be revived if the Plan is to succeed.

Cranbrook was conceived as a private development with developers delivering the strategy. The Planning Authority, whilst overseeing planning applications did not, and is not, exercising any authority as a development corporation and that omission is quite apparent. Equally both District and County Councils have withdrawn into their statutory responsibilities with regards to the Town which delivers a two-tier service within East Devon with Cranbrook expected to pay for itself and at the same time support the remainder of the District financially. If this approach is repeated in the new settlement the same mistakes will arise.

One of the very big errors in Cranbrook was attempting to manage public amenities through an estate rent charge and management company. This approach was grossly expensive to residents and provided a very poor service to the community. The Local Plan should address the issue of management companies and estate rent charges in relation to larger development. The approach does not work and Cranbrook proved that. Other Districts have addressed this point, but the draft local plan does not despite this being raised with the Planning Authority ahead of the local plan work.

Update following Meeting of the Planning Committee held 19th December 2022

The Chairman reminded Members that the Committee previously considered the draft East Devon District Council Local Plan at its meeting of 5th December 2022 making a variety of comments on the District's strategic approach including the need to learn the lessons from the delivery of Cranbrook. (Minute P/22/85).

The draft plan includes at strategy 33 the requirement to connect to district heating where the development is within 1 km of an existing network, or where no network exists, to create a new heat network for proposals over 1200 homes or 10 ha of commercial space.

Every winter, as soon as there is a cold snap, there is a major failure of the District Heating in Cranbrook. It is not always the same issue and this year another issue has arisen with apparent widespread failure of valves in individual HIUs (Heating Interface Units). The resilience of district heating needs to be addressed as part of the proposed strategic requirement.

The cause of the current issue will have to be determined but it has left many homes without heat and hot water throughout a very cold weekend of 10th and 11th December with many still in that position whilst ambient temperatures have been at or below zero. Whilst it is not clear as to why so many individual HIUs failed at the same time it is clear that the system lacks resilience and Eon do not have the resources to respond. Residents were unable to report the issues to the Eon contact centre. Some reported hanging on for two hours. Some eventually only managed to do so by sending a Facebook message to the Council's appointed Eon liaison member who in turn contacted senior staff at Eon who passed the details to the engineer on site which is not acceptable.

Equally Eon clearly has limited engineering capability and whilst the few engineers worked through Saturday 10th December into the evening, it was insufficient resources to provide a response with residents waiting a few days without heating and hot water.

Eon did provide a limited number of electrical heaters but they do not heat a home. Some families moved to stay with relatives but some vulnerable residents remained at home with no heat.

With the draft local plan setting out a strategy of rolling out District heating in larger developments, the LPA needs to ensure that the strategy is properly supported with operational resilience and the capacity to respond to system failures which in the current case it is not.

Whilst the LPA insisted on the current district heating, it was not a party to the master agreement which is confidential between Consortium and Eon and as a result has no knowledge of any service level agreement nor any knowledge of sanctions in the event of that SLA not being reached. The strategy 33 of the draft local plan not only needs to address resilience but it needs to ensure that the LPA is a party to any contractual agreements so that it can exercise due control as a planning authority.

The Committee seek assurance that the strategic requirement in Strategy 33 of the draft local plan to connect to district heating be fully supported with operational resilience and the capacity to respond to system failures.