

Cranbrook Town Council
The Cranbrook Plan - Preferred Approach
Response from Cranbrook Town Council.

There are a number of overriding principles which inform the Town Council's approach to the development of the Town. These are:

The principle aim - over and above the delivery of bricks and mortar - is the delivery of a sustainable and cohesive community. That "community" includes the Town's immediate neighbours of Rockbeare, Clyst Honiton, Broadclyst and Whimple. The Town Council wishes to achieve a development that is seen as positive and of benefit to this wider community so that it becomes a local hub for the delivery of welcome facilities and services whilst, at the same time, respecting the wishes of its neighbouring settlements (which have been in existence for a very long time) to maintain a physical separation and retention of their identity. Any suggestion that the development of the town will have an adverse impact on these wishes will, in turn, have an adverse impact on the ability to establish a cohesive and sustainable community.

The Town has been growing and occupied for the past five years. People have invested in the town and its surrounding parishes and that investment has been informed both by the original design principles and strategies and policies contained in the local plan.

The application of the Community Infrastructure Levy (CIL) to the expansion areas gives rise to concern about the ability to deliver much needed town infrastructure as the development grows. Discussions to defer and enhance key town centre facilities (that otherwise would have come forward from the original s106 agreement on the initial 3500 homes) to meet the needs of a much larger town - on the basis that s106 payments from the expansion areas would top up the funding - will now not be as simple and may not be possible under current CIL rules. There is a need for a separate debate about how infrastructure would be secured under the current CIL arrangements.

The Town Centre is contained within the original 3500 outline approval and is not therefore specifically addressed through this plan. It is crucial that the town centre area comes forward before (or at least alongside) the expansion of the town. What is the vision for the town centre? Apart from the proposal for temporary modular units, what is being done to actively market this essential part of the town?

Whilst not strictly a planning issue, there is need for clarity and certainty on a future governance review to determine the boundary of the parish of Cranbrook. The District Council has made it clear that it will not meet any of the management costs of facilities in Cranbrook (such as the Country Park) and expects the town to do so wholly through an Estate Rent Charge or Town precept paid for by residents of the town. For the town and its Council to be able to meet this challenge, there is a need to ensure that any future development of the town is within the parish of Cranbrook otherwise the town will not have the critical mass of council tax receipts to manage its affairs. Suggesting that housing development within surrounding parishes might deliver some financial incentive to those parishes (through CIL and subsequent council tax receipts) is not appropriate.

Whilst density is explored in the plan, housing mix is not and this needs to be considered. Development hitherto has concentrated on the delivery of a disproportionate level of social, affordable by design and lower cost housing with less than 10% being above band D. As a result, the demographic mix of the town is unusually young and unbalanced. Future development should

look towards the provision of a broader mix of house types to bring forward a more balanced community.

The Town Council has a number of more general comments in response to the proposals contained in the plan and these are set out later in this report.

Picking up on specific questions within the published questionnaire the following comments are made:

Part B - Q4. Masterplan Evidence and how the plan has responded

The “evidence” set out in the plan stems from a series of pieces of work by different sets of consultants which, in turn, has led to a number of proposals. Looking at each area in turn: -

Culture and Community:

Neighbourhood Centres at two gateway locations along the B3174 - The eastern location is dependent upon whether the Grange expansion comes forward - see comments later in this report. That aside, the principle of two neighbourhood centres as proposed is not supported by the evidence nor are they supported by the town council. When the town is built out to around 8000 homes the traffic movements along the B3174 from within and through the town will be so great as to make these centres unsafe. In addition, the assertion in the plan that they will catch passing trade is of no benefit to the town as this trade will by-pass the town centre and have an adverse economic impact on town centre viability. Neighbourhood centres should be just that - located within local neighbourhoods providing convenience to local residents as their prime purpose.

Meanwhile spaces - Given the pressure to deliver housing numbers (which has led to very unpopular proposals to develop in certain parts of the Cranbrook plan area) and the constraints which limit development (railway, airport and flood areas) it is felt to be unrealistic to suggest that developable land suitable for homes will be available for this purpose.

Opportunities for civic space at key junctions within the neighbourhood centres - It is not sure what is meant here but the answer is not apparent in the plan.

A formal town park - It exists now and is retained as part of the current western expansion area application.

Country parks with views over the surrounding countryside and Cranbrook - These stem from the fact that the town is being developed around areas of land affected by potential flooding and therefore they are a natural element of the planning process rather than a proposal that stems from evidence gathering.

Economic Development:

The business ladder for Cranbrook - This is a concept that has been in place for a number of years and dates back to work undertaken jointly with the original community development worker. It recognised then the fact that many businesses currently work from home and need access to easy-in - easy-out, low cost, low risk, business incubation space in which to grow. This leads on to moving to more established retail and employment space and ultimately occupying more mainstream retail and business park spaces.

The business ladder which incorporated a Market hall included Modular Space (known then as Cranbox) leading to small retail / employment space leading on to more mainstream retail / employment space.

This concept has been modified in the plan by the proposal of mix use areas within the town where residential and employment land will sit side by side. The whole point of providing the first step in the business ladder is to provide some easy-in, easy-out low cost, low risk employment and retail spaces so that residents can get their businesses out of their residential environment. Living alongside business is not popular simply because of the impact on residential amenity by noise, disruption, vehicle movement and parking.

In addition, the provision of mixed use reduces the number of homes that, otherwise, could be provided on those parcels which in turn increases pressure on other development areas in the plan.

Education - Clarity of how CIL will impact on the ability to bring forward the necessary schools is required and not addressed in the plan.

Transport and Movement - Setting out a movement hierarchy based on 1 Pedestrians, 2 Cyclists, 3 Buses and Trains and 4 Cars is rather a theoretical and conceptual approach particularly as the plan is framed as to put cycling at the top of the agenda. The movement plan contains a number of aspects which will be very difficult to deliver including a second train station or second platform at the existing station and effective north/south links. Those N/S links shown in the plan are very limited in nature and will not provide effective and usable linkages as the town grows.

The principle of having jobs near homes is supported but the answer to that is not mixed use but the fact that there is sufficient employment space allocated within the town and nearby at Skypark, Science Park, Hayes Farm including Lidl and Exeter is easily accessible by cycle and public transport. But people will still need cars to access N/S routes both for employment and leisure.

Landscape and Visual Impact - At the stage of the original Issues and Options consultation, four expansion scenarios were proposed upon which the community was asked to comment and select their preferred option. Two scenarios were blighted by airport noise, one was north of the railway line and the other was "south of the B3174". At that time the local plan had included provision for the South West expansion towards the airport and there was in place an outline planning application for that area. Other potential southern expansion areas were subject to green wedge policies within the local plan and to all intents and purposes out of the picture.

The proposals in the plan are presented as "the least sensitive" but what is not explored is whether "the least sensitive" is itself acceptable. It is not just about visual impact but also how the proposed expansion development impacts on green wedge and impacts upon the separation and identity of the local settlements.

The plan talks of protecting important views from Rockbeare but the proposal to the west of Parsons Lane - formerly set as green wedge in the local plan - is now included in the proposals and this is on the down slope of land which faces Rockbeare.

Open Space - The proposals exceed requirements and there are a number of areas to the east which are now proposed as open space which were allocated for strategic development in the local plan. If these areas were included within the allocation for housing as originally planned, there would be no impact on Whimple which would still be protected by an expanse of green space, and there would be less pressure to build homes in places which give rise to so much concern.

The sports facilities and allotments are welcomed. There is a need to ensure that sports pitches are supported by a clubhouse of sufficient stature to provide for an income stream to support the sustainability of the sports provision.

Drainage - Effective drainage is a crucial element of development in this part of East Devon yet the plan only sets “some basic principles for dealing with drainage and works on the basis of allowing adequate space for the worst case scenario in terms of provision of drainage basins”. Does this go far enough?

Overhead Power Lines - Undergrounding is proposed to free up land for development. This is rationalised on the basis that it could be paid for by the housing on the land freed up. However, the work would need to come from the CIL receipts and there is no guarantee that this would happen - and if the line were not undergrounded the CIL receipts from the same number of homes could be utilised for other infrastructure.

There is concern that the underground line could have an adverse impact on the school which is proposed on the land.

Gypsies and Travellers - The Devon Partnership G&T accommodation assessment identified the need for sites within Devon. As a result, up to 30 pitches are allocated in the local plan in Cranbrook. The Town Council is aware that recently this need has reduced slightly and that the figure required is now around 28. The Town Council has consistently accepted that a reasonable and fair proportion of pitches for settled families could be allocated in the Town. The Town Council and Gypsy and Traveller Liaison Officer at Devon County agreed that a reasonable number would be 10 or 12 pitches located in two sites of 5 or 6 pitches each.

The Town Council has consistently said that larger sites are unworkable and against policy. It has also consistently said that there needs to be separation between sites for settled families and those in transit and between the different ethnic groups.

It would totally be against all known policy to provide two sites of up to 15 pitches each and to co-locate people from different groups.

The Town Council seeks assurances that transit provision will be located away from residential properties to protect residential amenity.

The location of the site off Station Road is totally unacceptable in all respects - location, size and mixed occupation. The site to the east is in a more acceptable location but is too large and should have a settled occupation and not include transit provision.

Noise - Residential development adjacent to the airport needs to take account of potential noise issues especially with regard to engine testing. Measurement of noise levels is essentially a technical question which needs to be resolved with developers.

What is possible is the location of employment, sports and open space land - again why is employment land included in mixed use areas when there is ample potential to provide employment land adjacent to the airport which is within easy walking and cycling distance of residential development.

Airport Safeguarding - Clearly there is a need to ensure that aircraft navigation systems are not affected by development.

Part C - Q5. Design principles

A number of the design principles especially mixed use areas and density around the neighbourhood centres are predicated upon acceptance of the principle of mixed use and proposed locations of the two neighbourhood centres located on the B3174. As the principle of mixed use areas and the

locations of these neighbourhood centres is not supported, the design principles that refer to them are equally not supported.

The principles of effective foot and cycle linkages is accepted.

The proposals about density and location of housing do not address the key issue of housing mix leading to a balanced community.

The Town Council has for some time been pressing for the extension of bus route 4 to include the rail station. Access, including a bus stop, is in place and since the service currently spends some minutes waiting at Clyst Honiton to rationalise the timetable, there is no reason why this service could not be extended now.

There is a need for the bus service to take account of the young demographic. Either this needs a different bus design to cater for more pushchairs than the current two per journey or more frequent services between Exeter and Cranbrook. There are too many instances of parents and their children being refused entry to the bus and being left behind at bus stops because the bus driver will not allow more than two pushchairs on to the bus even though the bus has ample passenger space available.

The Town Council welcomes the proposals for neighbourhood health and wellbeing hubs to supplement the Central hub proposed for the town centre. The question is whether these are viable and can be funded through CIL.

Part D - Masterplan

Q6 - Bluehayes.

The western expansion proposals in the local plan provide for a green corridor between the western extent of Cranbrook and Station road. In the current plan this has been removed. In addition, local plan allocations have specifically excluded a highway link with Station Road and again these proposals include two vehicle linkage points. Both proposals are not supported.

Station road is narrow with poor visibility particularly towards its southern end. The traffic that uses Station Road now is extensive as it is the principle north / south link. At peak times there are long queues in Station Road as traffic joins the B3174. Fast forward to a time when the B3174 is being used by a fully developed Cranbrook and fully developed local employment land and exiting Station Road will become very difficult unless the road and junction are considerably upgraded. Adding to that by creating links to the western part of Cranbrook will only add to the difficulties.

There is no apparent foot or cycleway linkage between the homes along the northern part of Station Road and the rail station.

The Neighbourhood area as proposed is not supported because it is located astride what will be a very busy junction. This neighbourhood centre should be re-located within the western parcel.

Mixed use development is not supported, and this should be residential for the reasons already stated.

The proposals for the gypsy / traveller site have been commented on above. They are not acceptable as proposed.

Access from the North to the station is desirable with the potential for provision of a foot and cycle link - possibly (subject to the Broadclyst Neighbourhood Plan) linked to some development north of the railway line on the existing industrial site.

Q7 - Treasbeare.

Comments above about the neighbourhood centre and mixed use apply equally to this part of the proposals.

The land adjacent to the airport and subject to noise restrictions on housing development should be maximised for employment purposes subject to constraints imposed by the airport.

The proposed housing development east of Parsons Lane should be retained as green wedge in accordance with the published local plan strategy.

The extent of housing development in this part of the town is linked to technical finalisation of airport noise assessments and constraints on airport navigation systems.

Q8 - Cobdens.

The Town Council questions the viability of undergrounding the overhead cables and seeks information as to what the fallback position is?

The proposed school is located adjacent to a large area of open water. The Town Council questions whether this is desirable?

Mixed use allocation should be removed and reallocated to housing as commented above.

The neighbourhood centre location (which is linked to Grange) is not supported for the reasons already stated.

Areas allocated as SANGS to the east of the development were allocated in the local plan for housing - it is not clear why this has changed particularly as SANGS are over-allocated. There is opportunity for further housing in this part of the town.

The provision of a second Cranbrook station seems unrealistic and unviable given that the overriding need is more frequent trains which can only come forward by the provision of a passing loop. It seems that in terms of priority the second station is lower than the loop which could be provided by a second platform at the existing station or an independent loop between Cranbrook and Whimble. It is felt that both a loop / second platform and second station would impose significant pressure on CIL receipts and be unviable.

Comments on the Gypsy and Traveller provision are stated above.

Q9 - Grange.

Development at Grange is not supported. This area is designated green wedge to protect the separation and identity of Rockbeare. This proposal erodes that principle and will do nothing to enhance the opportunity to provide a cohesive and sustainable new community.

Comments about mixed use and the neighbourhood centre arrangements are as stated above.

Q10 - General Comments

Housing provision is an issue for the District Council if it is to meet its Local Plan allocation. There is some room for manoeuvre because the local plan is over-allocated by around 1000 homes.

Housing numbers in Cranbrook need to be brought forward with sufficient numbers to sustain a new town of the scale proposed but within the natural constraints of its locality. These include the obvious matters such as railway and airport but also include factors including the impact on its neighbours.

It is considered that if mixed use is removed from all parcels and replaced by residential (with employment land allocated in the town centre, neighbourhood areas, and on the land nearest the airport supplemented by adjacent employment areas), additional housing allocated on the eastern expansion area as originally envisaged in the local plan and housing allocated in the south-west (Treasbeare) area when noise assessments are agreed, there would be sufficient development to potentially remove the need for the south-east (Grange) development area.

When the plan is agreed, a governance review should be conducted to ensure that the whole of the town of Cranbrook is governed by a single administration.

Part E - Q11 - Land budget, density, height and delivery

The key issue is the delivery of a balanced community. At present that is not being delivered because of the housing mix and density being provided in the current phases. If the current (or as suggested in the plan - higher) rate of affordable homes is to continue there is a need to have an assessment of whether this high level is needed for the remainder of the development. There is a balance to be drawn between the need for affordable homes, viability, infrastructure delivery and affordability and the resulting balance in the community.

The delivery proposals in section 7 seek to indicate how infrastructure would be delivered but these proposals fall short in explaining how key infrastructure especially in the town centre would be financially supported and whether the proposals as set out would comply with CIL.