

**CRANBROOK PLAN DEVELOPMENT  
2013-2031: February 2019**

**ANSWERS: Issues and Questions  
For Examination  
29 November 2019**

**P. Boekman (367)**

**Matter 14      Infrastructure Delivery**

**Issue 20      Are the Infrastructure Delivery Provisions Justified and Effective in the light of Previous Delivery?**

Q163            There is no certainty with reference to the delivery of further infrastructure. The delivery of facilities to the existing development has been defective.

Q164            The overall per home cost on figures defined is defective. A detailed breakdown of how these figures have been ascertained is required. There are not enough items included and the costing lacks merit.

Q165            The integrated community aspirations of the plan are severely reduced due to the imbalance of the provision of facilities in the first phases of Cranbrook.

AQ20            A proper feasibility report is required as to the costing of the infrastructure delivering provisions to make the Cranbrook scheme workable. It is obvious that the development has not made adequate provision for all the items detailed in Q164.

Ian Kemp  
PO Box 241  
Droitwich  
WR9 1DW

04.01.2020

My Reference 367

Dear Sirs

Issues and Questions for Examination Janet Wilson BA BTP MRT1 DMS  
21.01.2020

With reference to my letter dated 02.01.2020 I would enclose answers with reference to Issues and Questions for Examination dated 29.11.2019.

I have issued under separate cover, additional Representation to that Submitted on 16.04.2019 that I wish the Inspector to take into consideration.

The Representation form issued by East Devon District Council was explicit in that objection to the Cranbrook Plan must fall under: (Legal Compliance and Duty to Co-operate), and (Soundness).

Therefore I would refer to those Headings as follows:

**Sub Heading 2 – Legal Compliance and duty to Co-operate**

It is my claim that there is no supporting evidence within the Cranbrook plan that it has complied with the Planning and Compulsory Purchase Act 2004. Reference **Critical documents** Folio 2 (Additional Issues and Questions) and (Issues and Questions 03.01.2020)

**Sub Heading 3- Soundness**

It is my claim that the Cranbrook plan is not **positively** prepared. Reference **Critical documents** Folio 2, 3, and 9 (Additional Issues and Questions) and (Issue and Questions 03.01.2020)

It is my claim that the Cranbrook plan is not **Justified** Reference **Critical documents** Folio 12 (Additional Issues and Questions) and (Issue and Questions 03.01.2020)

It is my claim that the Cranbrook plan is not **Effective**. It is not deliverable over its period as effective joint workings on cross-boundary strategic matters have **not been dealt with**. Reference **Critical documents** Folio 12 and 13 (Additional Issues and Questions) and (Issue and Questions 03.01.2020)

Within the Cranbrook plan there is there is not enough evidence that within documents issued by East Devon District Council ( Database Index 12-13 ) and (Issues and Questions 03.01.2020) to seek a modification to the plan, other than to **delete** the plan in its entirety due to it being **defective**, and **non-compliant** , with reference to ( Issues and Questions 29.11.2019).

It is obvious from the lack of any firm planning data, included within documents issued by East Devon District Council, that they cannot support a Cranbrook plan. They do not have the Management infrastructure to sustain a creation of a New Town. The Cranbrook plan has been issued with a total reliance on external planning consultants who have no knowledge of East Devon heritage, and a reliance on Developers for planning and finance.

This lack of input from East Devon District Council has meant that the Cranbrook plan is advocating the absorption of the surrounding villages of Broadclyst, Rockbeare, and Whimble, by Cranbrook with no consideration to their cultural heritage, or that of East Devon.

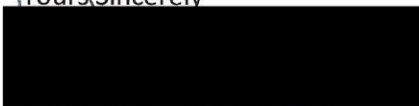
There is no input within documents issued, from the Developers. To issue a Cranbrook Plan for adoption without a detailed feasibility study from the Developers is a serious omission.

Consideration has to be given as to whether the Cranbrook plan is in breach of the 1935 regulations which prohibit Ribbon Development.

The existing Cranbrook development is poor in infrastructure, town planning, and design build and quality. It has no Town centre. It is my claim that the existing Cranbrook development is unsuitable to support the Cranbrook plan for expansion.

It is my claim that the Cranbrook plan as submitted is defective and therefore should be rejected. Any future scheme envisaged, should be reduced in size so that the existing infrastructure can support it and a new Cranbrook plan to take heed of East Devon Cultural Heritage.

Yours Sincerely

A black rectangular redaction box covering the signature of the sender.

CC : East Devon District Council Offices  
Blackdown House  
Border Road  
Heath Park Industrial Estate  
Honiton EX14 1EJ

## **Database Index**

- Folio 1. National Planning Policy Framework**
- Folio 2. Planning and Compulsory Purchase Act 2004**
- Folio 3. The Cranbrook Plan Development 2013-2031 February 2019**
- Folio 4. Cranbrook Town Council Business Plan 2019-2024**
- Folio 5. Economic Development Strategy for Cranbrook**
- Folio 6. East Devon Infrastructure Delivery Plan –November 2017**
- Folio 7. Cranbrook Expansion. David Lock Associates –December 2014**
- Folio 8. Cranbrook Plan- The Preferred Approach**
- Folio 9. Sustainability Appraisal-2017**
- Folio 10. Cranbrook in Common (GINKGO)**
- Folio 11. East Devon Local Development Scheme**
- Folio 12. East Devon Local Plan 2013-2031**
- Folio 13. Restriction of Ribbon Development Act 1935**

**CRANBROOK PLAN DEVELOPMENT  
2013-2031: February 2019**

**ADDITIONAL**

**ANSWERS :       Issues and Questions  
                      For Examination  
                      29 November 2019**



**Tel: 020 7910700**

**Critical Documents:**

**Additional Representation**

Issues and Questions for Examination 29.11.2019

- Folio 1 : National Planning Policy Framework
- Folio 2 : Planning and Compulsory Purchase Act 2004.
- Folio 3 : The Cranbrook Plan Development 2013-2031
- Folio 9 : Sustainability Appraisal 2017
- Folio 12: East Devon Local Plan 2013 - 2031
- Folio 13: 1935 ACT Restriction of Ribbon Developments

## **The Cranbrook Plan Development 2013-3031 February 2019**

### **Critical Documents:**

### **Additional Representation**

Issues and Questions Examination 29.11.2019

#### **Folio 1: National Planning Policy Framework**

There is no clear evidence within the Plan that any attempt has been made to prepare a clear factual feasibility to substantiate the critical clauses within the NPPF

There appears to be a clear Breach that the fundamental requirements under clause 35 have not been adhered to. Documents issued by East Devon District Council have not been Positively prepared, Justified, Effective and consistent with the National policy on delivery of a substantial development.

Enclosed are list of Critical clauses which I claim East Devon District Council are in Breach.

#### **Folio 2: Planning and Compulsory Purchase Act 2004**

There is no clear evidence within the Plan that it has complied with the relevant clauses as stipulated within the Act, where the emphasis is that the proposal MUST comply within the stipulation of the ACT.

I would request that under Clause 5 (a) and (b) that if the Secretary of State thinks Necessary and expedient to do so to revoke the RSS submitted and part of the RSS as he seems appropriate.

With reference to Clause 21(a) to direct the Local Planning Authority to modify the Development plan submitted if found to be unsatisfactory.

A planning application was submitted on 28.06.2017 by Hallam Land management Limited, Taylor Wimpey with the Agents name as being David Lock Associates. This application is still 'Live'. Hallam Land Management claims within their Website that they have obtained planning permission. This is defined as 'Predetermination' and is a clear breach of the ACT

Enclosed are list of Critical clauses which I claim East Devon District Council are in Breach.

**Folio 3: The Cranbrook Plan Development 2013-3031**

With reference to the forward by Ian Thomas leader of East Devon District Council he claims that 'Key Building blocks' have been put in place to ensure Cranbrook community was a close-knit affair. It is denied that this has been implemented.

Cranbrook is not a vibrant and attractive place. The plan has not removed the Uncertainty and barriers to continue the smooth delivery of the Town. The Town has no transport, or infrastructure, and is 100% reliant on Developer funding base on the sale of residential properties.

The Document is defective.

Enclosed are list of Critical clauses which I claim East Devon District Council are in Breach

**Folio 9: Sustainability Appraisal of the Cranbrook Master Plan October 2017**

East Devon District Council has used the consulting practice of 'LUC', and David Lock Associates in preparation of this report. Both practices are not familiar with the cultural heritage of East Devon

The Sustainability Appraisal is a statutory requirement of the Planning and Compulsory Purchase ACT 2004. It is issued to minimise any potential impacts on planning development. This Appraisal is not compliant and is therefore defective.

It is noted within Clause 2:22 that document included within the Master plan are **Assessed** and not an actual draft document as required by the DPP.

This Sustainability Appraisal appears to be a hypothetical document and its implication cannot be applied as there are no actual facts and figures to implement its recommendations.

Within Clause 4:13 it emprises that 45 dwellings per hectare is envisaged as the norm as recommended for a development of this size. This figure is disputed. For a development of this character and in this location 35 dwellings per hectare would be more appropriate. (Savills defining density 16.09.2015)

Enclosed are list of Critical clauses which I claim East Devon district Council are in Breach

**Folio 12: East Devon Local Plan 2013-2031.**

Reference Clause 2:5 which confirms that the elderly population profile is average 60/65 in East Devon. Therefore where is the demand for new housing recommended within the Cranbrook plan?

Reference Clause 2:6 which confirms that Edge Analytics 2015 report, assessed that the objectively assessed housing required for East Devon is 950 homes per year. Therefore where is the demand for new housing recommended within the Cranbrook plan?

Reference Clause 3:15. One of the jobs of the planning system is to provide a clear picture to Public, Private, and voluntary bodies about proposals for future development. Clearly the Cranbrook plan has failed to do this.

Reference Clause 5:4 which confirms that the Local Plan is subject to the Sustainability Appraisal. As that document is non-compliant the East Devon Local Plan is defective.

**Folio 13: Restriction of Ribbon Development 1935 ACT**

The Cranbrook plan confirms that the overall scheme is restricted to land situated between the Exeter Waterloo railway and the London Road. Due to this restriction the development has encroached on the existing villages of Whimble, Broadclyst, and Rockbeare.

Due to the concentration of houses envisaged within the overall location of the development. The Cranbrook plan has all the characteristics of a 'Ribbon Development'. Other than the planning application submitted on 28.06.2017 by Hallam Land Management on behalf of Simmons Homes and Taylor Wimpey there is no constructive detail to ascertain as to whether this development breaches the 1935 ACT.

The ACT was introduced to prevent indiscriminate development that is often the impairment of natural beauty and to ensure that Highway authorisation extends their vision beyond the creation and maintenance of the mere traffic convenience for which they are responsible and to safeguard the environment.

Making the London Road as being the main access to Cranbrook and a primary route for through traffic appears to be a classic case defining why the 1935 ACT was implemented. It appears on the information available, that the Cranbrook plan is in danger of breaking the covenants in Statute Law as incorporated within the ACT.

## National Planning Policy Framework

### **Cranbrook Written Statement Notes - 8th January 2020**

#### Item 32

Local Plans and Spatial Development Strategies should be informed throughout by a **Sustainability Appraisal**. It is crucial the Sustainability Appraisal complies with the legal requirements confirmed within the Planning and Compulsory Purchase Act 2004.

#### Examining Plans

#### Item 35

Local Plans and Spatial Developments and Strategies are examined in accordance with legal procedural requirements on whether they are sound. Plans are **sound** if they are:

- (a) Positively prepared - providing a strategy which as a minimum seeks to meet the areas objectively assessed needs.
- (b) Justified - an appropriate strategy taking into account in these alternatives and based on proportionate evidence.
- (c) Effective - deliverable over the plan period and based on affected joint working on cross-boundary strategic matters.
- (d) Consistent with National Policy - enabling the delivery of sustainable development.

#### Item 47

Planning Law requires an application for planning permission to be determined in accordance with the Development Plan. Decisions on the application should be made as quickly as possible and within statutory time scales. **Refer Planning Application**

#### Delivering a sufficient supply of Homes

#### Item 60

To determine the minimum number of homes needed strategic policies should be informed by the Local Housing Need Assessment conducted using the standard method in National Planning Guiders. Refer CPPE.

#### Item 72

The supply of a large number of new homes is best achieved to larger-scale development provided they are well located and designed and supported by the necessary infrastructure and facilities.

## Rural Housing

### Item 78

To promote sustainable development in rural areas housing should be located where it will enhance or maintain the vitality of rural communities.

## Building a strong competitive economy

### Item 80

Planning Policies and Decision should create the conditions in which businesses can invest, expand and adapt.

### Item 81

- (a) Set out a clear economic provision and strategy which will positively and proactively encourages sustainable and economic growth.

### Item 90

Where an application fails to satisfy the sequential test or is likely to have a significant adverse impact on one or more of the considerations in paragraph 89 it should be refused.

## The Promoting Sustainable Transport

### Item 102

Transport issues should be considered at the earliest stages of plan-making.

Clause (a) opportunities from existing or existing transport infrastructure and changing transport technology and usage are realised to the scale location or density of the development that can be accommodated.

### Item 104

Clause (b) provides for any large scale transport facilities that need to be located in the area.

## Achieving appropriate densities

### Item 122

Clause (c) the availability and capacity of infrastructure and services.

Clause (e) the importance of securing well designed attractive places.

## Achieving Well Designed Places.

### Item 124

Duration of high-quality buildings and places is fundamental to what the planning and development process should achieve.

### Item 1300

Permission should be refused for the development of a poor design that fails the opportunities available for improving the character and quality of an area and the way it functions.

### Protecting Green Belt Land

#### Item 135

Clause (d) Demonstrating the necessity for the green belt and its consistency with strategic policies for adjoining areas.

### Planning and Flood Risk

#### Item 155

Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at high risk.

#### Item 158

The aim of this sequential test is to steer development to areas with the lowest risk of flooding. Developments should not be allocated or permitted if there are reasonably available sites appropriate with a lower risk of flooding.

Planning and Compulsory Purchase Act 2004

Clause 2. Regional planning bodies

Clause 3

Item 3

The RPB must monitor the implementation of the RSS throughout the region and (b) consider whether the implication is achieved and the purpose of the RSS. (NB. Part 1 Regional Functions Section 1. Regional Spatial Strategy).

Clause 5

Item 3 (e) in preparing a draft revision the RPB must have regard to the desired resources likely to be available for implementation of the RSS and

(f). the desirability of making different provisions in relation to different parts of the region.

Clause 10 Secretary of State Additional Powers

Item 5

(a) And (b) If the Secretary of State thinks it necessary or expedient to do so he may at any time revoke an RSS or (b) such parts of an RSS as he seems appropriate.

Part 2

Local Developments

13. Survey of Area

The Local Planning Authority must keep under reviews and matters which may be expected to affect the development of their area or planned office development. These include

- (a) The principle, physical, economic, social and environmental characteristics of the area of the authority.
- (b) The principle purpose for which land is used in the area
- (c) The size, composition and distribution of the population of the area
- (d) The communication, transport system and traffic of the area
- (e) Any other considerations which may be expected to affect those matters.
- (f) Such other matters as may be prescribed to the Secretary of State in the particular case made direct

## Planning and Compulsory Purchase Act 2004

Clause 18 Statement of Community Involvement.

Clause 21 Impletion by the Secretary of State. If the Secretary of State thinks that a local development document is unsatisfactory

(a) He may at any time before the document is adopted under Clause 23 direct that the Local Planning Authority to modify the document in accordance with the direction.

Clause 24 Section 1 provides for a regional spatial strategy RSS in every region other than London, The RSS must set out the Secretary of Estates Policy however expressed.

Clause 35 Annual Monitoring Report.

Every Local Planning Authority must make an annual report to the Secretary of State.

Item 2 The Annual Report must contain such information as is described in 2 (a) the implementation of the Local Development Scheme (b) the extent to which the policy is set out in the Local Development documents being achieved.

**Notes on Development Plan Document The Cranbrook plan 2013/2031 New Document Produced February 2019.**

Councillor, Mr Ian Thomas, Leader of East Devon District Council states that there is 4,000.00 living in Cranbrook now. Indicate that over 90% of people have moved from within Devon. Is this true? Confirms it is expected to expand to a population of 20,000 people. Is this 20,000 more or 16,000 more?

Page 30

Cobdens Expansion Plan. This affect Whimble 110 hectares is allocated for mixed use of development. 1,495 new homes. How does this affect Wimble?

Page 61 – CB 15 Delivery of suitable alternative national green space. SANGS states that 100 hectares of land is safeguarded. **Where is the allocation for Whimble.**

Page 67 – 120 item 43

You need a design code to be agreed for each expansion area. It has not been agreed previously with disastrous results.

Page 68 – 120 – Item 48

States that Developers should ensure in drawing up proposals a detailed statement of significant, once with their relevant application taking into account of heritage assets. Why is this coming from Developers and not directed by East Devon District Council. Developers are there for profit.

Page 71 of 20 – Item 4.14

States the standards are part of a wider housing standard. These are not mandatory. Too much relies on Developers.

## NOTES ON SUSTAINABILITY APPRAISAL TO CRANBROOK MASTER PLAN

Prepared by Planning Policy Section East Devon District Council October 17. The draft of the sustainability appraisal has been prepared in support of the proposed Cranbrook Master Plan as presented at East Devon District Council Planning Committee on 6<sup>th</sup> November 17.

- 1.1 The sustainability appraisal has been prepared by Officers at East Devon District Council a part of an interrogated sustainability appraisal (a) as sustainability environmental assessment (SEA).
- 1.1 East Devon District Council employed a consultancy firm of LUC as a critical to view the form and the approach involved. Where is the LUC Report?

Page 3 - Table 1.

In 2015 Savills first commissioned to produce a Cranbrook Master Plan (**where is a copy of Savills' Report**).

Page 4. – Item 1.15(Initial Regulation 18)

The first formal stage preparing the Cranbrook Plan (under Regulation 18 of the Plan Making Regulations). Put in place in June 2015. **What is Regulation 18.**

Page 7

Provision of information on the decision. When the Plan of Programme is adopted the public in any countries consulted under Article 7 must be informed. **What is Article 7** and what is the definition of After the Cranbrook Plan is **adopted**.

Page 12 Definition of SA objectives and framework for the Cranbrook Plan.

Page 13 - Item 2.12. What is the National Policy Framework.

Page 1 - Item 3.9. The Cranbrook Plan must be in line with National Policy as set out in the NPPF and its National Planning Practice Guidings. What is the NPPF.

Page 18 - Item 3.14

Notes Cranbrook is a rapidly developing new town in East Devon, close to the City of Exeter and neighbouring Whimble and Rock Beare. First mentioned implication to Whimble

Page 19 - Item 3.20

First mention of delivery of suitable alternative natural green space (SANG) .

Page 23 - Item 4.3

Savills Team took two different designs ideas why were they not made available to the public.

Page 24 - Item 4.9

It is stated that Cranbrook Master Plan does not actually have a specific vision or specific bulk objective. There is no specific SA appraisal.

Page 25

It is noted that Cranbrook properties being built are 42 dwellings per hectares.

Page 27 - Item 4.22

It is noted that other areas of land at near Cranbrook can be developed. What are there? Why aren't they included?

Page 28

Comments by David Lock Associates for East Devon New Community Partners (EDNCP).

The comments are not complimentary to the Cranbrook Plan. Why haven't they been disclosed?

Page 33

It is confirmed by Gilling Hayes Planning for Mr A Pemberton that there is a request for their clients' land for development at Higher Cobden Farm.

Page 43 - Item 5.23

Confirms the excellent public transport service at Cranbrook, will provide access to further education places to Exeter and the surrounding area (**Existing bus service is poor. The railway service is appalling**).

Page 50 - Item 55 and 56

Confirms that Whimple, one of the villages closest to Cranbrook.

Page 63 - Item 58 and 59

Gypsy and Travellers

The claims that provision of Gypsy pitches would have a positive affect on housing; **how can this be?**

Page 75 - Item 68

Claims that higher density housing closer to the Town Centre should re-enforce a positive benefits of more people being in close proximity to the Centre. This has not happened on previous developments in the country. It has had an adverse affect with high density housing.

Page 90 - Item 17

Confirms as a general comment the success of Cranbrook to date has been reliant on securing the developer contributions and direct developer efficient facilities and services. **Why is this so and surely has an adverse affect on design. A Developer is only interested in profit. Just look at the existing development which is of very poor design and layout.** Page 106 states that within the western expansion (Blues Hayes) they want delivery of one of two Gypsy Travelling sites required for the Town. **Why is it required for the Town.**

Page 112 – Item 822

Cobdens (Eastern Area) Again, delivery of 1 or 2 Traveller Sites required for the Town. Within page 120 states not to play with the Gypsy Site provision. What is wrong with this?

Page 125 – Item 856

States the provision of a passing loop is seen as a significant positive benefit in respect of the objective 12. The rail system needs more than a passing loop in its present state. The rail system is appalling.

Page 139 – Item 8.99

States under infrastructure policy advises of a provision on site to mitigate the impact of development. It doesn't say there must.

Page 168 – LUC Report

Need to know what the LUC Report is.

Page 178

Confirms that inevitably there will be 18,000/20,000 new residence which will impact the character of the landscape National Trust Consultee.

## **Relevant Information Database Index**

- Folio (i) National Press Information**
- Folio (ii) CPRE- Press Information**
- Folio (iii) Objection Gypsy and Traveller site**
- Folio (iv) Predetermination: Planning submissions**
- Folio (v) Austerity Town Devon Life**
- Folio (vi) Cranbrook Town Council business plan 2019-2024**
- Folio (vii) Cranbrook Development Strategy**
- Folio (viii) Cranbrook Expansion; David Lock December 2014**
- Folio (ix) Cranbrook Preferred Approach**

**Information – National Press**

**Sunday Times, Build Quality, Sir Oliver Letwin MP - 6th April 2019**

Persimmon Homes built at lower standards to reduce costs focusing not on customer's purchases but overall profitability substantially limited the Green credentials. One of the fundamental problems with house building is that the larger developer dictates the design and note cost of building with no input other than that contained within statutory requirements. There is an exceptionally high density of housing in Cranbrook the closeness of properties and the lack of privacy will affect the health and well being in the environment.

**Independent magazine - 6<sup>th</sup> August 2018.**

Green belt being built on at an alarming rate and most new homes are unaffordable.

**Financial Times - 2<sup>nd</sup> June 2019**

Local Authorities bus funding in England is to be cut by more than 40% in a loss or reduction of more than 3,000 bus services nationwide.

**Finance Times - 26 June 2019**

MP Claims one of the fundamental problems with house building is the dominance of a few large developers planning regulations failed to provide a mix of homes required.

**Daily Telegraph - 26 June 2019.**

Concerns about the quality of new homes being built Government reported considering excluding Persimmon from the homes help to buy scheme because of the bad quality of construction.

**Mid Week Herald - July 24 2019.**

Land next to Cranberry Farm designated for the Town Centre is still empty fields. East Devon District Council involved following legal discussion. Is in talks with the Cranbrook Consortium Taylor Wimpey Hallam Land Management Persimmon Homes and Redrow Homes to update the agreement. New Agreement has not been signed off.

**Evening Standard - 24 June 2019.**

Housing risk is at low rate with Councils. Dozens of houses and regeneration and infrastructure projects that cost the country could be cancelled after the Treasury raised borrowing costs.

**The Sunday Times - 4 May 2018**

Rt Hon. Nick Raynsford stated that key findings are current planning regulation fails to work effectively in the long term of public interest and communities and there is serious concern about Developers exploiting the system.

**Kian Mulheirn, Oxford Economics - 3<sup>rd</sup> September 2019**

Kian Mulheirn, Former Treasurer of Commons consultancy Oxford Economics confirms that housing stock is actually out ran the formation of new households over the past two and a half decades. There are more vacant homes today then there were in 1992. He claims that building hundreds and thousands of new homes is not the best way to address the affordability crisis.

**City AM - 28 February 2018.**

The housing crisis has many causes but the biggest is that with our current speciality of a home building system which treats homes like poker chips and serves mainly the benefit of the developers and landowners, home occupiers are left to pay the price with expensive and bad quality homes.

**Sunday Times - October 27 2019.**

Robert Jenrick appointed Secretary Estate of Housing Committee Local Government confirms that properties being built are often too small, shoddily built, ugly and depressively expensive. Warn that developers are building poor quality homes have to change their practices. Confirmed he is putting in place a new national design code.

**Evening Standard - 12 January 2018.**

Occupiers do not want to live in a faceless corporate developments divide of life and culture in fact they don't want to be anywhere near them. They prefer to be in places with real urban texture with high-quality modern architecture.

**Financial Times - 20 December 2019.**

Persimmon, one of the major developers in Cranbrook. Confirmation that it is capitalism at its worst. They are a land assembler and a house seller. If the authorities want a company to be a builder of quality homes they should reconsider Persimmon purpose and ambition.

**Herald in Brief - 10 June 2019.**

East Devon MP raised his concerns over plans for 20,000 new homes in Cranbrook. We have all had enough of volume developers building identical housing often of different qualities.

### **East Devon Watch - 7 June 2019.**

43% of all renters face affordability problems and 55% renters unable to buy a home of their own.

Swire MP confirmed that Cranbrook is a development problem.

### **Exeter Rousers Group - November 2019**

Exeter Rousers Group. The Exeter Waterloo line train times drops consistently. September's figure was 80.1%, October dropped to 72.9%. Most delays applicable to signalling point's failure, rolling stock shortages. Confirms no provision or plans to repair old 30-year rolling stock.

### **Cranbrook Herald - December 2017.**

Towns Church Minister confirmed the unauthorised Gypsy site in 2017 was the most difficult moments of the year.

### **Daniel Clarke - 22 February 2019.**

Confirms planners have been given the go-ahead for a total of 3,580 new homes to be built in Cranbrook. Confirms East Devon District Council Planning Committee intend to back Cranbrook Planned Development Plan DPD for further 4170 houses to be built.

### **Evening Standard - 25 April 2019.**

Developers are facing a perfect storm. Setbacks include fall in house prices, rising construction costs and high taxes. The buy to let sector demands for affordable housing mean it is impossible to make a profit. Quite simply they can't make the sites work anymore.

### **Chartered Institute of Building - June 2019.**

Message from the Housing Forum 40% of housing quality is getting worse. Clients should be focusing on quality other rather that cost. They are compromised when cost and quality is lost in a drive to build the maximum number of homes with a small amount of money.

Hallam Land Management Limited 31 September 2019. Confirms have obtained planning permission at Cranbrook Devon for 3,500 properties.

### **Planning Application - 28 June 2017.**

A planning application by Hallam Land Management in conjunction with Persimmon Homes and Taylor Wimpy for the first development that is designated as BlueHayes to determination. This Planning Application is still open.

22nd October 2019 Confirmation by Persimmon Homes and Hallam Land Developments including Taylor Wimpey Development that they have appointed Clark Willmott Solicitors in relation to the planning aspect of obtaining permission of a new community in Cranbrook East to Exeter

### CPRE - 12th October 2018

Jonathan Lee outlined the report key findings. Sir Hugo Swire East Devon MP and Dr Phillip Bratby from CPIE he talks about the failings of the Government Housing Policy and impacts on Devon. The ORS Report reveals that the number of new homes planned for Devon is considerably overestimate based on the flawed Government Methodology for assessing future housing needs. The majority of new homes are being built to satisfy demand from inward migration. The ORS Report confirms that the failure to make provisions for enough homes at the right time and in the right place.

The main housing problem is not to supply homes; it is the problem of affordability. The affordability problem for first-time buyers is not solved by increasing house building in the area. The vast majority of the houses in Cranbrook will be sold at the market rate and thus out of reach of first-time buyers. East Devon housing needs should be met by affordable homes built in existing communities rather than large housing estates built on green filled land.

Cranbrook is the development led a New Town with a lack of defective Town Planning and local influence. The Town Council is a consulting body with limited power. The Cranbrook is without high-quality design and build. There is a lack of employment, amenities, leisure activities and no focal point for the new town. There is no Town Centre. The NPPF has (a) an economic objective to build a strong responsive and competitive economy. (b) The Social objective to support strong viable and healthy communities by fostering a well designed and safe built environment (c)an environmental objective to contribute to protecting and enhancing their natural build and historical

### Green Town

Cranbrook was seen as a prototype for a new echo town as a groundbreaking low carbon community. Existing Cranbrook is a dormitory town for Exeter and is devoid of community facilities.

CPRE Campaigned to protect rural England as stated predicted population growth may be in error in terms of the needs of housing. The current forecast for housing is based on the maximum capacity developers can build not on the actual requirement for housing. See the Campaign for Rural Development Report in 2018 confirms there are ground filled sites in and around Exeter to allow the construction of more than 14,400 houses which include 337 ground filled sites in Devon totalling 900 acres. Report dated 2018.

The Local Government Association (LGA) has said that the definition of affordable housing in the updated National Planning Policy Plan work must include homes for social rent. There appears to be none at Cranbrook. The proposed CB4 for Gypsy and Travellers Site does not appear substantially located at present and is shown to be located on the East of Exeter on the Cranbrook plan area. Part of the site falls outside the proposed CB8 built-up area

boundaries of Cranbrook as indicated under the first master plan. This conflicts with the National Policy and Guidance by EDDC Gypsy and Travellers site. Assessment Anthology August 2015.

Travellers sites seem to be sustainable economically social and environmental. The development is inappropriate due to the lack of schools and GP services, transport, local amenities and general infrastructure. Within the East Devon revised local development scheme there is a requirement to consult communities before submitting development proposals. What is contained within the Cranbrook Development Plan is different from that which went out to public consultation. Cranbrook does not have a Town Centre and therefore the existing town is in effect a suburb of Exeter. The Town Centre was considered a priority with the originally outlined planning permission for the first 2,900 houses. East Devon District Council is in talks with the Developers to spend their funds for the building of a Town Centre.

# 'Difficult' moments when gypsies arrived

**The unauthorised gypsy and traveller encampments at Cranbrook in 2017 were one of the most difficult moments of the year, says the town's church minister.**

The Reverend Lythan Nevard believes the visitors left the town at 'about the right time', saying that if the encampments had gone on for much longer they could have become 'divisive' and might have 'broken the town's spirit'.

But although the encampments produced 'negative experiences' for the town's residents, the church minister is hopeful that it won't affect future relations with those who come to live in Cranbrook's proposed gypsy and traveller sites.

"It was difficult," said the Reverend Nevard, the minister for Cranbrook's Cornerstone Church, as she recalled the lengthy encampments at Cranbrook railway station in March and April, followed by a shorter encampment in June near the Education Campus, in Tillhouse Road.

"I think they left at just about the right time," she said. "I'm

**PAUL STRANGE**  
paul.strange@archant.co.uk

pleased to say that it never became something that broke the town's spirit or became very divisive, which it could have done.

"I know there are people who felt that we could have done more as a town, and others who would have liked to have been allowed to do other things, but it didn't happen and there was a peaceful end.

"The third group of people - who went near the Education Campus - were polite and friendly. If all the travellers could treat the place that they're staying in with a little bit of care, that would have been helpful.

"At the same time, not everybody who is a traveller is scary or wanting everything. Sometimes we can have a view of people and we automatically expect that they are going to be tricky.

"They are not always and it's disappointing that the people who were here the longest, didn't make co-existence easy.

"Because we will be having fixed sites somewhere around Cranbrook, what I would hate is that the negative experiences that we have had with one group of people who choose to live in a certain way would mean that people won't be welcoming to those who come to live permanently amongst us."

**For an in-depth interview with the Reverend Lythan Nevard, turn to page 16.**

## **Herald** **Cranbrook**

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Flashback: Travellers at Cranbrook Station in March 2017. Ref mhc 14 17TI 0442.

Picture: TERRY IIFE



Cranbrook Plan  
Planning Policy  
East Devon District Council  
Blackdown House  
Border Road  
Heathpark industrial Estate  
Honiton  
EX14 1EJ

16.04.2019

Dear Sirs,

**LETTER OF OBJECTION  
PROPOSED GYPSY AND TRAVELLER SITE AT COBDEN  
(HAND AND PEN) WHIMPLE**

I would object to your proposal to establish a Gypsy and Traveller site adjacent to the A30 main Road in the Cobden area as I believe that this site is completely unsuitable for members of the gypsy and travelling communities. The proposed site and associated facilities in Whimple and Cranbrook would not be suitable to meet the needs of the gypsy and travelling community, or the existing communities.

**Road Safety/Road Access** – Road access to the site is by a busy “A Road”, where there have been a number of accidents over the years. The local constabulary have confirmed that 75% of vehicles travelling from Cranbrook to the Gypsy Mead roundabout exceed the road speed limit. The proposed site would be counter to the aspirations of and appraisal of the Cranbrook Master Plan 2019 and East Devon Casualty Reduction Programme.

**Public Transport** - There is very limited public transport available from Cranbrook. The proposed site would mean residents of the Travellers settlement would in reality have no alternative but to use private vehicles and the railway is subject to delays and is of poor service. The limited availability comprises only a very limited bus service.

- No: 382 is every 2 hours on week days; not appropriate for discouraging private vehicle use

**Shops/Conveniences** – There are a limited number and range of small shops in the area.. There is only 1 no shop in Whimple. The village convenience store is only really for essentials. The nearest major supermarket is in Ottery St. Mary. Therefore if Gypsy and Traveller site were to be established on this site it would result in an increase in the use of cars and other vehicles in the local area to allow residents of the Travellers site to obtain their provisions from the Supermarkets in other towns.

**Schools-** The 1no local school within walking distance of the proposed site is at full capacity or close to capacity. The school at Cranbrook is at full capacity. The new planning application for houses which us in the process of going through at the moment will also impact on both the local Schools attendance levels and capacity to accept additional pupils substantially in the coming years.

Whimple Primary School cannot take the increase in pupils, it will destroy the education base.

Therefore, the capacity of the School in the village to provide secure and stable education to families moving onto the proposed Gypsy and Traveller site will compromise it's capability to provide a secure education to their children at School level.

**Doctors** - The nearest doctor's surgery is in Whimple, or Cranbrook which has only has 1 no GP. The nearest emergency out of hours is situated in Exeter (10) miles away.

The proposed site will be detrimental to the Health care provision for the Travellers community through their remoteness from suitable capacity and suitable provision of service. It is recognised that this community will need good access to Primary, General & Specialist healthcare.

**Foul Sewer:** There is currently no provision on or near the site for the disposal of foul sewage into an adopted (South Western) foul & surface water sewer system. The area is subject to flooding.

The closure of Cobden will have an adverse affect on transport in Whimple. Cobden Lane is used as an overflow when there is a road blockage to the main access road.

**Conclusion:**

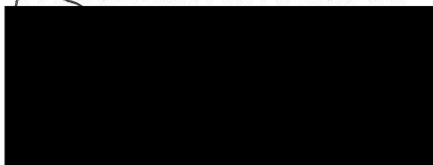
1. Extensive & expensive alterations would have to be made to the current public sewer system – leading to significant disturbance to both utilities infrastructure provision and transportation infrastructure efficacy in the immediate area.
2. The transport system is inadequate to take an added burden of a traveller site.
3. Schooling in the village cannot accept a surge in pupils

Please register my objection to the potential Gypsy and Traveller site on Cobden for the reasons stated above.

Please also acknowledge by return receipt of my letter, and confirm that the objections I have raised are valid and will be considered in your consultation process and keep me informed of developments on this matter

Yours sincerely

P. Boekman FCPA. MCIOB





## THE EXPANSION OF CRANBROOK

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A plan for where the next 4,170 homes in Cranbrook will be built has been backed – and it will see homes built south of the old A30.

Planners have already given the go-ahead for a total of 3,580 new homes to be built in the new town of Cranbrook, with a total of 7,850 eventually set to be built.

East Devon District Council's Strategic Planning Committee on Wednesday morning backed the Cranbrook Plan Development Plan Document (DPD) which outlines the land where a further 4,170 new homes will be built, and that it is expected that at least 100 new homes will be built in the town centre.

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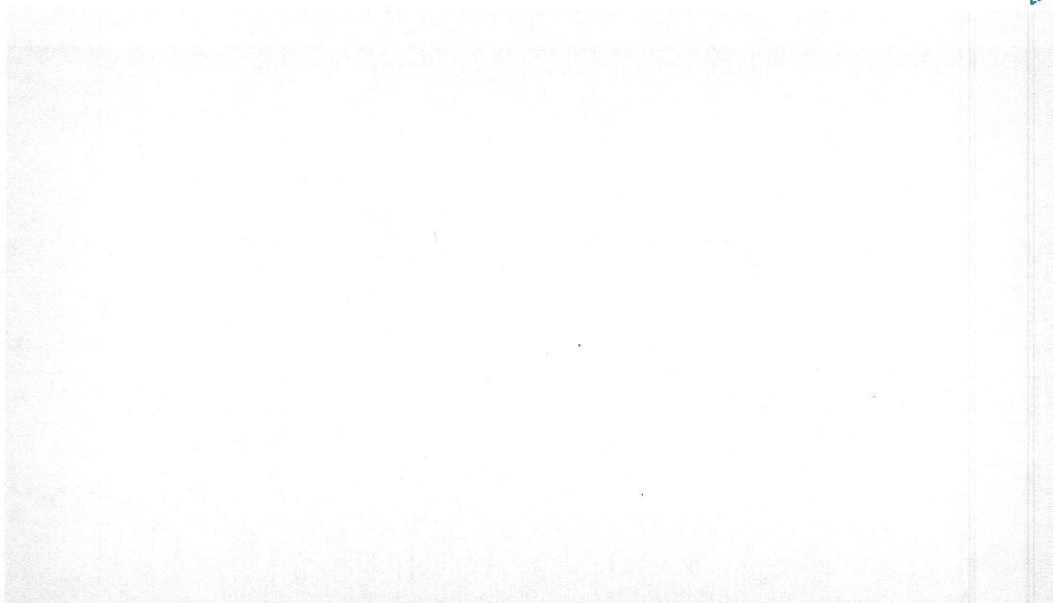
East Devon District Council's Strategic Planning Committee on Wednesday morning backed the Cranbrook Plan Development Plan Document (DPD) which outlines the land where a further 4,170 new homes will be built, and that it is expected that at least 100 new homes will be built in the town centre.

**D** READ MORE

▶ Fears that Eden Westwood scheme has been "gifted" land at Junction 27

Development would take place at Bluehayes, to the west of the existing development, and include 960, Treasbeare, south of the existing development and south of the old A30, and include 915 new homes, Cobdens, to the east of the existing development, and include 1,495 new homes, and Grange, to the south of Cobden and south of the old A30, and include 800 new homes

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**The four expansion areas of Cranbrook**

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**BLUEHAYES**

40 hectares of land at the Bluehayes Expansion Area is allocated for a mixed use development, which will include:

- Employment land
- Allotments totalling an area of 0.54 hectare of land.
- A Suitable Alternative Natural Green Space
- Land for an extension to the District Heating Energy Centre
- Five serviced permanent pitches for gypsies and travellers

The Treasbeare expansion area will comprise a mix of housing, education, community, sport, employment and commercial uses (together with safeguarded land for the energy centre) that importantly will provide a key location for activity in the town and act as a hub for education and sporting facilities in this area. The sports hub in Treasbeare will be the main hub in Cranbrook and provide a wider range of facilities than at the Ingrams Sports hub further to the east.

## **D** READ MORE

▶ Introduction of Universal Credit has seen rent debts to council TRIPLE

## **COBDENS**

110 hectares of land at the Cobdens Expansion Area is allocated for a mixed use development, which will include:

- Around 1495 new houses
- A neighbourhood centre to provide at least 1250 square metres gross of groundfloor floor space, including shops and a range of business spaces
- A 630 pupil place primary school, 80 place early years provision and a room for community use
- A 50 pupil place Special Educational Needs school

9v9 football pitch

- Allotments totalling an area of 0.88 hectare of land
- Ten serviced permanent pitches for gypsies and travellers
- Serviced land suitable to accommodate a place of worship and parsonage
- Serviced land (of at least 1 hectare in size) for a cemetery
- Development of the Cobdens expansion area of Cranbrook will require the undergrounding of the 132kv high voltage power line that crosses the site as indicated in the Cranbrook Masterplan.

This Cobdens expansion area will contain around 1490 new homes and social and community facilities. It will include provision for a neighbourhood centre and associated mixed and meanwhile uses as well as a large area of Suitable Alternative Natural Green Space (SANGS).

**D** **READ MORE**

- ▶ [Rocketing recycling rates in East Devon are 10 years ahead of target as council asked to share secrets of success with others](#)

**GRANGE**

30 hectares of land at the Grange Expansion Area is allocated for a mixed use development, which will include:

- Around 800 new houses
- A community building
- A neighbourhood centre to provide at least 1600 square metres gross of groundfloor

and wellbeing hub, a leisure centre, a civic centre, a library, a children’s centre, a youth centre, plus retail uses, is included in the DPD.

A town centre is considered a priority as since the original outline planning permission for the first 2,900 homes back in October 2010 was granted, only The Cranberry Farm pub has been constructed on the land and residential development of the town has now taken place both east and west of the Town Centre, leaving it as a void.

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## Cranbrook

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The committee heard that original plans for the expansion of Cranbrook included a limited amount of built development in the Green Wedge surrounding Rockbeare, but that land has since been taken out of the plan. Only one field that is in the green wedge remains in the DPD, on land in Clyst Honiton parish, but Ed Freeman, Service Lead for Planning Strategy and Development, told the committee it doesn’t conflict with their neighbourhood plan.

He added: “It would only have a minor impact and would not undermine the green wedge. We don’t believe the plan is contrary to the local plan so don’t see an issue in terms of process.”

**Key policy points in the Cranbrook Plan DPD**

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obliged to take into account responses from the consultation before submitting the plan to inspector for consideration, while Barry James, on behalf of Persimmon Homes, called for further scrutiny of the DPD so it was not rushed, adding: "We cannot with confidence tell members that we support this."

**D** **READ MORE**

▶ Council to start charging developers who build new homes to pay for waste containers

The committee revised the recommendation to approve the Cranbrook Plan Development Plan Document for consultation and to recommend the Cranbrook Plan Development Plan Document to Full Council for submission to the Planning Inspectorate for Examination in public, subject to any necessary changes from the consultation being approved by the strategic planning committee first.



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its going to be great - exemplar development / sustainable / low carbon housing . if anything like the existing , nothing further from it.

Is this housing for East Devon or Exeter?

Hey lets try and make it half a decent place to live, more green space , decent sized gardens and lets move away from all those little boxes.

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**BRAGGYBOY71**

🕒 182 DAYS AGO

15 gypsy sites probaly end up with thousands of them and it will be squalor.

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## Summary

Reference	17/1482/MOUT
Alternative Reference	PP-06145419
Application Validated	Wed 28 Jun 2017
Address	Cranbrook Expansion Zone South Lane To Treasbeare Farm Clyst Honiton Outline planning application with all matters reserved except for the expansion of Cranbrook comprising up to 1200 residential dwellings, residential care home (C2); employment (B1, B2, B8 and collectively to comprise up to 35,000 sq metre); energy centre); petrol filling station with associated convenience retail and facilities; one 2-form entry primary school; local centre comprising A1 uses plus A2, A3, A4, A5 uses and B1 business use; sports and recreation facilities including an all weather playing surface with floodlighting, changing facilities and children play; green infrastructure (including open space and SANG); community uses (including D1 non-residential institutions); assembly and leisure, gypsy and or travellers pitches; access from former A30 and crossings; landscaping; allotments; engineering (including ground modelling and drainage) works; demolition; associated infrastructure; and car parking for all uses
Proposal	
Status	Awaiting decision
Appeal Status	Unknown
Appeal Decision	

## Further Information

Application Type      Major - Outline application

## Expected Decision Level

Parish Clyst Honiton

Ward Broadclyst

## District Reference

Applicant Name Hallam Land Management Limited, Taylor Wimpey UK Ltd

Agent Name David Lock Associates

Agent Company Name David Lock Associates

Agent Address Mr N Freer 50 North Thirteenth Street Central Milton Keynes MK9 3BP Buckinghamshire

Agent Phone Number

Environmental Assessment Requested Yes

## Contacts

### Agent

David Lock Associates

EMAIL [nfreer@davidlock.com](mailto:nfreer@davidlock.com)

Telephone Number 01908666276

### Ward Councillors

Councillor Chris Pepper

Address College Cottage Broadclyst Exeter EX5 3HX

Councillor Eleanor Rylance

Address Westwood House Westwood Broadclyst EX5 3DH

Councillor Sarah Chamberlain

Address 6 Railway Terrace Broadclyst Station EX5 3AX

### Important Dates

Application Validated Date Wed 28 Jun 2017

Expiry Date Tue 22 Aug 2017

Actual Committee Date

Last Advertised In Press Date Wed 05 Jul 2017

Agreed Expiry Date Fri 10 Jan 2020

Decision Printed Date

**Environmental Impact  
Assessment Received**

**Temporary Permission Expiry  
Date**

**Related Information**

There are 0 cases associated with this application.

There is 1 property associated with this application.



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"Given the looming trigger points we are rapidly approaching the point of no return."

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By **Daniel Clark** Local Democracy Reporter

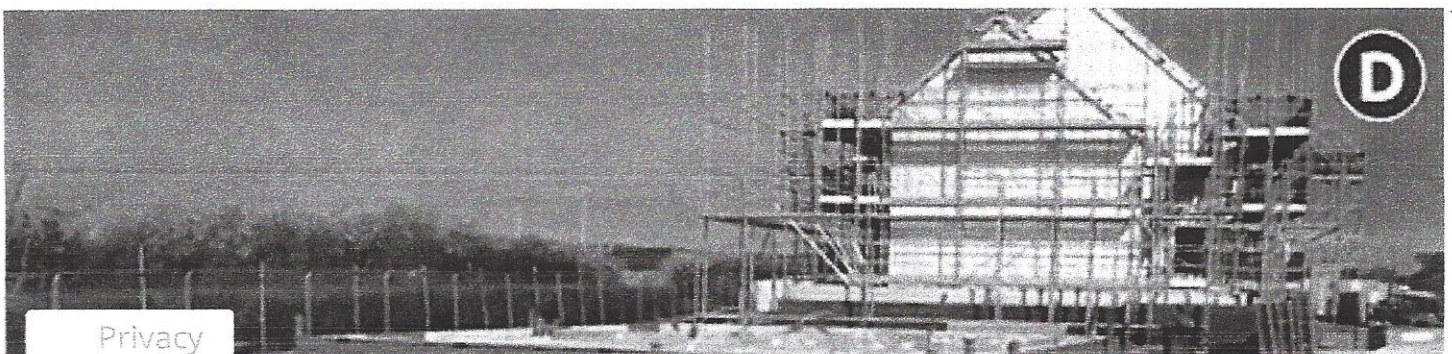
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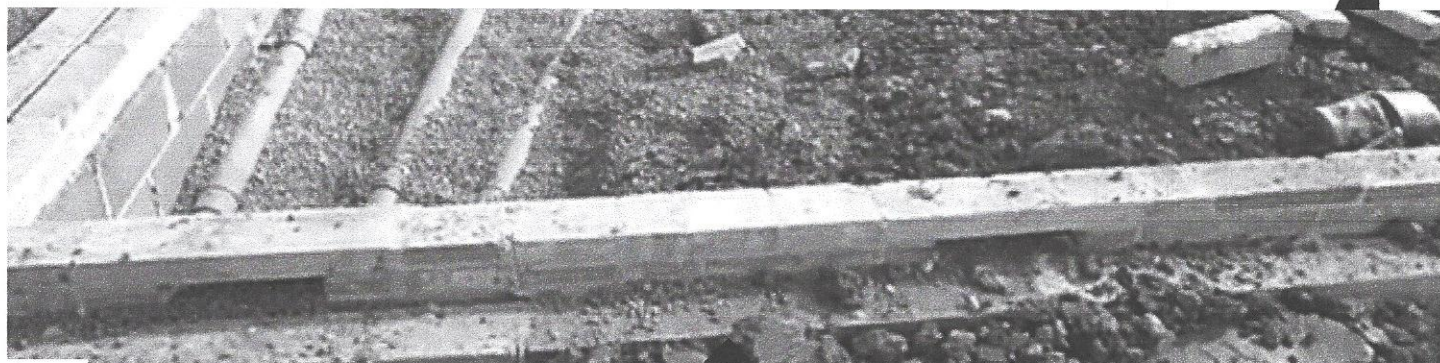
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Cranbrook is on the verge of becoming 'an austerity town', councillors have been told.

Nearly 2,000 homes in the new town are currently occupied but the town is lacking all but the most basic of facilities.

A supermarket, a town hall, a library, an auditorium, a skatepark, a youth centre, a children's centre, retail units, and offices were all promised but have yet to be delivered.



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### East Devon Up-To-Date News



Around Sidmouth



Cranbrook was initially due to be delivered through a commercially-driven model with no public control of the land. When first approved, it was described as "a blueprint for new

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### Cranbrook from the air

However, East Devon District Council's cabinet on Wednesday night heard that the legal agreement that plays a critical role in establishing the trigger points for the delivery of facilities has become 'an inflexible legal document which was negotiated in a different financial era' and some of the facilities were 'no longer fit for purpose'.

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▶ The town with no centre: Will new town Cranbrook ever realise its potential and finally be completed?

Among the current obligations is the Cranbrook Consortium must provide a children's centre at 2,500 occupations. Devon County Council has now served notice on the consortium and requires them to design, construct and complete them by either June 10, 2021, or when 2,500 homes are occupied.

Andy Wood, projects director, told the meeting: "We are therefore in danger of defaulting to it may not be fit for purpose or affordable over the longer term. Given the



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High Street KFC closes



His report recommended a strategic delivery board is created to deliver critical community infrastructure in Cranbrook and the subsequent challenges for the future service delivery in the town.

He said that the delivery of assets and services in Cranbrook is fundamental to the successful achievement of the vision for the town and the board will play an important role in coordinating delivery.



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Mr Wood added: "The original vision for Cranbrook was as a freestanding new community which would be capable of supporting its own assets and services. In a constrained financial environment there is a need to actively reinvent how these will be delivered on a sustainable basis.

"Without this, there is a significant risk that Cranbrook will become an austerity town, bereft of the facilities and services that the population both expect and demand. The proposed Strategic Delivery Board is considered to be the best means to ensuring the necessary coordination and oversight."

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The new board will have a specific objective to develop an Implementation Plan for the delivery of key assets and services in the town, identify and secure funds including coordinating applications for funding, and ensure consistency of approach between all three tiers of local government so as to be able to speak with one voice.

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### Most Read



Hurricane could bring warm weather

Cllr Sam Hawkins, who represents the Cranbrook ward, said this would not be a 'one-stop' fix, but hopefully should bring clarity towards the delivery of the town centre. He added that in the past there has been a lack of cohesive thinking across the three tiers of local government but that this should ensure effective communication.



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### Cllrs ~~Jess Bailey~~, Ben Ingham, Susie Bond and Kevin Blakey at Cranbrook

Cllr Kevin Blakey, who is the portfolio holder for economy and also a Cranbrook councillor, added: "This is not before time. The liaison between the three councils has not been as good as it should have, so hopefully this board should address this."

As well as tackling climate change, being open and transparent and updating the Local Plan, a town centre for Cranbrook is one of the top priorities of the new Independent administration for the council.



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► This is what East Devon's Independent administration plan to do in the next four years

Cllr Blakey added: "The provision of the town centre at Cranbrook is a top priority. The vitality of the town will be massively boosted by the provision of the Town Council building, a dedicated GP practice, supermarket and library. The land is there ready and waiting - it's time the heart is put into our new community."

The membership of the Strategic Delivery Board will comprise of:

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- Portfolio Holder for Economy and Skills, Devon County Council
- Representative of the Broadclyst division, Devon County Council
- Portfolio Holder for Strategic Development, East Devon District Council
- Lead Member for Cranbrook, East Devon District Council

The cabinet unanimously agreed to establish the Strategic Delivery Board and that an annual report detailing the work of the Board and its associated progress comes back to them.

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### Location of the proposed town centre in Cranbrook

The new Cranbrook Plan, detailing how will the town eventually develop to consisting of 7,750 homes with a population of around 18,000, has been submitted by East Devon District Council to the secretary of state for examination.





## 1995

Talks about a new town in East Devon begin

## August 1995

The area around Broadclyst is first mooted as a possible new town site

## November 1996

Northampton-based Wilcon Homes reveal detailed plans of its 3,000-home scheme, claiming it has secured development options on almost 700 acres of land.

## September 1997

Rival plans for a new town by the Jack in the Green pub at Rockbeare are unveiled by Redrow Homes after approaching local landowners

## January 1998

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## July 2001

The preferred site for a new town to the east of Exeter on land between Broadclyst and Rockbeare for the 3,000 home development is revealed in the area's Local Plan

## July 2003

A consortium of five developers, called East Devon New Community Partners, submitted an outline planning application for permission to build the controversial new town

## February 2005

The new town is officially named Cranbrook. East Devon District Council voted for Cranbrook over Newton Lockyer by one vote for its official name. Other suggestions, such as Isca Parva, the Latin for 'Little Exeter', Sara's Folly — a reference to East Devon District Council leader Sara Randall Johnson — , Karime City, after the authority's environment director, Karime Hassan, and Atlantis, over fears the town would be prone to flooding, were rejected.

The preferred name derives from the Cranny Brook, which runs through the site of the new settlement near Rockbeare.

## March 2005

Altered plans for Cranbrook, proposed between the old A30 and the Exeter to Waterloo railway line near Rockbeare, have been submitted to East Devon District Council. As well as changing the hub of the village to a more central location, the new plans also include a new layout for a public transport corridor, ensuring that the bus route is within easy walking distance of all residents, and the creation of a a bus and train interchange at the railway station.



## September 2012

The energy centre for Cranbrook and Skypark unveiled.

## January 2013

Transport Minister Norman Baker formally opens M5 junction 29 improvements

## May 2013

Bus service to Cranbrook starts

## November 2013

The Younghayes Centre opens – triggered by 150 homes being occupied, but perhaps in a foretelling of the future, is behind schedule by technical issues

## December 2013

The Science Park has its first tenant

## August 2014

The first play area opens

## October 2014

The £9m Clyst Honiton bypass with new tunnel is completed



## April 2015

The GP surgery and pharmacy in the Younghayes Centre opens

## May 2015

Cranbrook Town Council is formed and the first elections are held

## June 2015

The milestone of 1,000 homes being occupied is reached

## September 2015

The Cranbrook Education Campus opens

## December 2015

Cranbrook train station opens

## May 2017

The Cranberry Farm pub opens



East Devon District Council launched an eight-week community consultation, called The Cranbrook Plan - Preferred Approach - to how Devon's newest town will grow and develop. The document sets out how the growth of the town up to around 8,000 households over the next 15 years will be achieved.

## February 2019

East Devon District Council's Strategic Planning Committee backed the Cranbrook Plan Development Plan Document (DPD) which outlines the land where a further 4,170 new homes will be built, and that it is expected that at least 100 new homes will be built in the town centre.

## May 2019

Deadline for developer's' town centre location plan missed.

## August 2019

The new Cranbrook Plan is submitted by East Devon District Council to the Secretary of State for examination. The plan aims to refresh the vision and policy for the town centre to respond to evolving and changing needs and pressures for development . It says that while existing planning permission exists for town centre development at Cranbrook, many of the assumptions are now somewhat dated and increasingly unlikely to be realised in a changing environment for town centres and tough retail conditions.

## September 2019

The Cabinet back plans to set up a new Strategic Board to deliver critical community infrastructure in Cranbrook and the subsequent challenges for the future service delivery in the town.

## Future Trigger Points that have not been reached - 2,000 homes

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### By 2,250 homes

The skatepark should be built before 2,250 are occupied, although the Consortium have been unable to find any suitable land

### By 2,500 homes

Children's Centre: To be built before 2,500 homes are occupied - Devon County Council have now triggered this and it must be built by June 2021

### By 2,500 homes

Land for permanent health and wellbeing complex (GP surgery): The developers are not obliged to build it, just provide the land before 2,500 homes are occupied

### By 2,500 homes

Ambulance and police station land: The developers are not obliged to build them, just provide the land before 2,500 homes are occupied

### By 3,450 homes

A youth centre, council building and permanent library.

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**Cranbrook Town Council Business Plan 2019/2024**

Management Structure. Appointment of a Deputy Clerk cannot locate one.

Section 106 Agreement between Developers and East Devon District Council. Management of the urban drainage system. Cannot locate the Deed of Variation to bring forward to ensure the Town Council has the funds. Delivery of the Town Centre is crucial with Exeter just 9 minutes away by train the Town Centre in Cranbrook needs to have a unique selling point to attract both Town support and neighbours. It has none. There is no Town Centre. Town Hall, there is none.

Financial Information - The budgeted annual expenditure for 2019-2020 is £474,068.00 the Cranbrook element of the council tax is £409,648.00. There is a shortfall of £64,420.00. Incorporated in the document is confirmation that Cranbrook is essentially a private development funded from housing sales and infrastructure and assets stem from various legal agreements associated with planning applications. Which is confirmed that East Devon District Council have made a conscious decision not to undertake any roles in the Town other than those which require to be formed by structuring.

**Forward Budgets**

There are two major contributing factors directly influenced and informed the budgeting process. One is the rate of delivery of house builders which determines the council tax base, the number homes used each year using a calculation of council tax and time and process of the delivery open space assets i.e. Town council. To meet this asset delivery, have to maintain pressure on the level of further development to ensure that it keeps pace with the financial demands pressed on the Town's community.

Basic Cranbrook has gone from pioneering new Town to almost unfit for purpose.

Devon Live 5<sup>th</sup> September 19. The town is lacking all but the basic facilities. East Devon District Council were informed that the legal argument that plays a crucial critical role in establishing the trigger points for the delivery of facilities has become a flexible legal document which was negotiated in a different financial era and the facilities will no longer fit the purpose.

**Appraisal of :-**

**EMPLOYMENT ECONOMIC DEVELOPMENT**

**STRATEGY FOR CRANBROOK**

**Employment**

Despite a promise by the Government that small businesses in the UK will get over 33 billion Pounds worth of government contracts by 2022 little seems to be changing.

In the last 5 years direct spending on MNE has grown by only 1% from 10% to 11%.

Since the collapse of Carillion at the start of the year there has been talk of a big shake up in the facilities management world especially around public sector contracts. Do the action really match the word, the answer is No.

The process for smaller SF or smaller FN Contracts currently being undertaken by Cranbrook does not fit in with the Crown Commercial Service as it favours large companies.

Cranbrook is a home for 20,000 people. Although Cranbrook is supposed to have considerable public funding for development established, there is no input to provide employment for 20,000 people. It is not correct that the new market Town is a centre for jobs and training and that the working population will find employment elsewhere via the Growth Point, or in Exeter. There is no Growth point in Cranbrook and its surrounding area. The only source of employment is the Science Park or Sky Park.

If Cranbrook is to become a successful and vibrant Town, it will need to create its own opportunities. There are none at this time in Cranbrook.

Within the EEDS for Cranbrook it is stated that Cranbrook will concentrate on three numbered themes

- (i) Supporting smaller and growing enterprises
- (ii) Creating employment services
- (iii) Building strong links with the growth point.

There is no big Employer like this in the Cranbrook area. Cranbrook is a ribbon development with no facilities. The only employer of any size in the East Devon area is in Exeter, Bristol or Taunton.

There will need to be strong employment within the Town; there is none. There is talk about the Cranbrook Business ladder ran by the community to provide a range of sizable premises for the local enterprises. This is not a sensible plan for 20,000 inhabitants. It is a recipe for unemployment and a reliance on state support.

It is a fantasy to expect a Town with 20,000 inhabitants to build its own business base and create a strong need with surrounding employment developments.

- (i) There is no surrounding employment developments
- (ii) There is no provision for a business growth point.
- (iii) There is no Development Plan to encourage "big business" in the area to provide employment.

It is stated that work opportunities and business growth by local facilities will need to keep pace with a rapidly expanding Town. This is East Devon, it is renowned for its beautiful countryside and its lovely beaches. One cannot foresee big employers moving to Exeter and Cranbrook to provide employment for the inhabitants of Cranbrook.

The new community partners are keen to back the ideas of a business ladder and create an enterprise Town. It is stated that public sector partners are willing to help to make these proposals a reality. It has been confirmed there is a contraction of these funds, not an expansion.

The existing Cranbrook Development is poor in design, poor in infrastructure and poor in quality and without a Town Centre. It is the wrong basis for an expansion of a Town or an Employment Centre.

Cranbrook does not sit next to major employment sites where there are extensive employment opportunities. The only two sites are Sky Park and Science Park, neither sufficient in size to absorb the high percentage of personnel in the Cranbrook Development.

There is a development proposal for a Town Centre including business space and retail space. Cranbrook does not have a Town Centre; Cranbrook is based on Development funding which at the moment is not available.

The comments that there is a demand for facilities such as hotel development, public houses and commercial leisure would be unpredictable. There might be growth points and large scale infrastructure projects in this urban extension for Exeter but as of now there are no employment prospects for some years to come.

The growth point programme will not deliver employment for 20,000 new homes. Cranbrook is just an urban development. Growth points are still in the early stages.

It has been claimed a significant public sector funding and investments including forward funding of infrastructure, has helped the private sector to commence developments. These developments are purely residential developments funded by Developers.

The railway and road infrastructure for Cranbrook is inadequate to cater for any more traffic or

The First Transport Group is expected to write off millions of pounds on its South Western Railway franchise as it struggles with sluggish growth. Investors are braced for the bus and rail

operators to slash the value of the franchise. It is a heavily indebted group which is under attack from investors. South West railways are rocked by Industrial action and problems with track upgrading. It only has one single track. The principle shareholder wants first group to quit UK rail. The bus service supporting Cranbrook is poor. There are no plans available to make it any better.

As there will be no employment there will be no place for the residence to go. It has been confirmed that the growth point shows that while housing has been delivered and there is a clear interest in providing more housing, the delivery of employment continues as being slow. It will take time for Sky Park and Exeter Science Park to develop, so where will the inhabitants of Cranbrook get employment. They will be on Local Authority assistance because there is no work.

Exeter is a major location for employment but a large proportion of the population who study at Exeter University when qualified leave the area. They go to Bristol and eastwards to Poole and Bournemouth for employment. What is left is the rump of small industrial premises which only have limited employment facilities. The only growth area within the construction industry is constructing residential developments. There is no real employment.

It has been confirmed within the economic developments strategy that Cranbrook will struggle to complete in attracting major business users and it needs to focus on providing employment where other sites cannot.

Cranbrook does not have any prior social or economic history and therefore does not have ideal conditions for developing an entrepreneurial culture. It has been confirmed that Cranbrook development has no specific business facility other than being driven by relatively small enterprises that operate from home. This is no way to support 20,000 inhabitants of a new town and is the wrong basis for the development of a Town employment policy.

Cranbrook has no good quality business premises, or skilled high value work forces, or enabling physical infrastructure. These are not conditions for creating economic activity but conditions for economic decline i.e. the workers will be on government assistance

Due to Brixit, the statement that the UK economy will regain its formal level of economic productivity within the next year and will become a profile model for growth. This statement is unfounded.

In the locality it is proven fact that in terms of income per head East Devon is 23.4% below the average in terms of output per ahead and the local economic issue is one of relatively weak productivity. This is not a recipe for a vibrant employment environment. In employment terms the growing sectors is in construction i.e. building residential accommodation not commercial premises for employment. It is denied that Cranbrook will have a good infrastructure with reference to motorway and rail. It is in a poor Broadband area and the surrounded road system in Cranbrook is already congested and unable to take traffic into Exeter where the only employment will be found. The macro economy is one of historically low growth.

It is stated that within the growth point there is evidence of demands for work, and opportunities for smaller retail outlets and the opportunity for Cranbrook to support the growth of a higher value local economy.

There are no facts whatsoever to support this claim. It is stated that there will be up to 1,450 jobs in Cranbrook by 2025. This would not support a population of 20,000.

It is planned there will be target of a local job for every new dwelling that is 7,000 jobs for Cranbrook. This is impossible. Cranbrook is not a special opportunity for employment. All it or can provide is small business start ups and this is not sufficient. Cranbrook as an enterprise Town might have big ambitions but it certainly does not have any infrastructure or employment to support it.

The Cranbrook business ladder is at heart of the EDS but it is flawed and defective. Within the "THAMATIC" approach the only items of employment of merit is the Sky Park and Exeter Science Park. There is nothing else contained within that approach. The claim that the business ladder will assist people starting business in their own home using the kitchen table is impractical. This is no basis for employment in a new town. There is talk about business investment within the business ladder. There is no incentive for business invests in Cranbrook. It is stated that the business ladder will not suit all business activity in Cranbrook. There is not any activity left. Therefore what business activity is there left? There is talk about providing local jobs for local business opportunities to grow and develop. There are no local businesses in Cranbrook of any merit.

The business ladder does not have any rungs and no visible support. There is a serious shortage of skilled tradesmen in the construction section but this is for the construction of residential developments which only emphasises the problems with the infrastructure within the area.

It has been confirmed in the financial press that the construction industry has incurred a decline of at least 6% in the last quarter of this year. Residential Sales are in decline due to lack of economic activity.

It is proposed that to retain skilled staff there would be a programme whereby employees could be allocated a small plot and allow time to construct their own homes. This is not a plan for employment. This is fantasy. It is confirmed that much of the phased development will take place without detailed knowledge for future demand. There is a Cranbrook Partnership but nowhere capital will be available. It confirmed that Cranbrook residents are already operating small businesses from home including, a taxi service, hairdressing, laundry cleaning, catering and pet walking. This is a 20,000 residential development and it is obvious that there are no employment prospects of any merit to support.

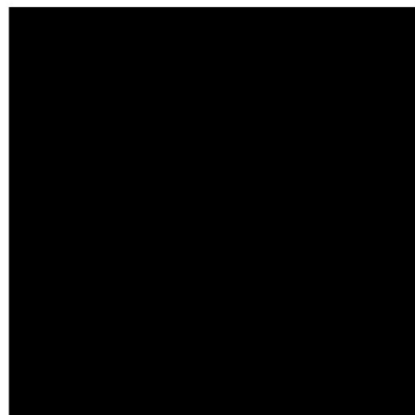
The employment prospects are virtually nil and with no infrastructure in place for employment. New Towns are constructed where there is demand for personnel as in previous new town developments. There was a need for that residential development because employment demand was there from day one. Cranbrook has no employment. If there is no employment, there is no income. If there is no income the town will disintegrate into a depressed area which is an apt description of what the existing Cranbrook development has become.

**HAVE YOUR SAY!**

**CRANBOOK PLAN: PREFERRED APPROACH 2017**

**QUESTIONNAIRE:**

**DUE DATE MONDAY 8th JANUARY 2018**



Date 3<sup>rd</sup> January 2018

## **Subject**

The Cranbrook Plan Preferred Approach October 2017.

## **Documents**

- Cranbrook Expansion Environmental Statement produced by David Lock Associates December 2014.
- Allocation for land necessary for development inclusive of key evidence documents. This document is undated.
- The Cranbrook Plan preferred approach master plan documents dated October 2017.

## **Evaluation**

These documents have been produced to substantiate a case by East Devon Council District to expand a localized new small village called Cranbrook into a New Town that is located principally between Honiton in Devon and Exeter, with the addition of a new railway station called (Cranbrook) allocated to this development.

## **Background**

This Questionnaire has been evaluated by Mr. Peter Boekman who is a Chartered Member of the Institute of Building and a Senior Partner of Protheroe Carter & Eason who are an established Chartered Surveyors in the City of London that has been established since 1898.

Mr. Peter Boekman has extensive knowledge of the locality where the development is proposed and would confirm that his parents lived in the locality of Buckerrall in the early 50's through to the late 70's.

Mr. Peter Boekman lived in the village of Talaton in the 70's with his children who went to Whimple Primary School.

As a Senior Partner of Protheroe Carton & Eason I have been involved in new town developments which have taken place in Harlow, Basildon, Laindon and smaller developments in the Hertfordshire Essex area.

I continue to be involved in developments at Canary Wharf and Stratford in East London.

This experience has been diverse as, I have experienced at first hand the rural environment of the farming Community and the commercial exploitation that has occurred in rural areas in the Essex and Hertfordshire borders.

## **Cranbrook Expansion**

### **History**

Before the Second World War New Towns of Welwyn Garden City and Letchworth Garden City were constructed and they have been successful in creating new towns which complimented the local villages of Letchworth, Hitchin, Old Welwyn, and Hatfield respectively.

The newer developments in Harlow and Basildon were not so successful. Harlow New Town did not learn from the expertise in the development of Welwyn Garden City and Letchworth and proceeded with a modern format not unlike what is being proposed at Cranbrook.

Harlow New Town was established in a very rich farming community with strong transport links into central London with an airport (Stansted) in close proximity. Today Harlow New Town is not a preferred location for new families or younger folk, but is only an option because of (cost).

The fabric of the town is now tired and is not able to sustain the increase in population which the town now attracts with the subsequent degrading of the local villages in its proximity.

Harlow pioneered satellite smaller centre within the perimeter of the main town. The development did have the advantage of the M11 motorway and the increased transport link from London to Stansted Airport.

Basildon New Town was developed in an area which was called 'plot lands' which consisted of East End families obtaining plots of land in rural Essex and putting a caravan or shed on the 'plot lands'. The creation of Basildon New Town did cause a tremendous strain on road structure, and the main A13 road into central London had to be upgraded to motorway standard. The rail service was subsequently upgraded accordingly.

The New Town expansion covered areas such as "Laindon" which was not unlike the village of Rockbeare and Broadclyst. These smaller villages have not fared well in the New Town expansion.

Town centre's such as Laindon and Corringham were designed similar to that what is being proposed in Cranbrook. These are now desolate, worn down and in poor repair. These town centre's are so ran down they can only be compared to poorer settlements which are still in place in Slovakia, and the Ukraine in Eastern Europe.

In the London area we had developments in London's Dockland and Stratford both of which were poor industrial waste land.

## **Cranbrook Expansion**

### **History**

The developments are more in keeping to its existing locality but mistakes are still being made. There has been no effort to implement within both developments any character whatsoever which was evident before the development took place.

Canary Wharf consists of row upon row of identical housing not dissimilar to what is being proposed for Cranbrook except for Tower Blocks being mixed into the overall design package.

In Stratford the Olympic Village consists of a development not dissimilar to Canary Wharf with absolutely any consideration to private residents as to locality to shops and facilities.

In the early 60's large scale development took place in North and East London where traditional terraced houses were pulled down and tower blocks were erected. These tower blocks created a complete lack of a neighbourhood structure which encouraged drug taking, and violence and was a great mistake in social housing.

There are examples where modern developments have been successful but the standard of design was high to enable the development to work. Most of them have been small developments not exceeding 750 houses that have been incorporated within an existing towns such as Chelmsford, Colchester and Bishops Stortford.

A creation of a "New Town" has to be very carefully evaluated as to its location. The new fabric of building and infrastructure is required to reflect the history of what is evident in Devon.

### **Location**

Broadclyst, Rockbeare and Whimble are traditional East Devon villages which have a rich heritage in farming and farmland. They have their own village schools and local public councils and have been in place for some hundreds of years. The infrastructure of these villages is not great and to an extent has restricted development accordingly, but it has kept the character of the villages which has made it a good environment to live in.

The dangers of creating inner "New Towns" can clearly be seen where new developments have failed to replace quality, richness and character of the existing area. The creation of a New Town such as Cranbrook clearly does not have anything in common with the locality. The damage to the environment and to the local population which has been in the dairy farming community from father to son cannot be emphasized enough. There is a strong case to be said that the development of Cranbrook is like building a **tower block "horizontal"**.

## DOCUMENTS

### **Cranbrook Expansion; The Environment Statement David Lock Associates December 2014.**

This Environmental impact assessment (EIA), is a very "lose document" and is extremely short on facts and makes numerous assessments which are not correct. The document has been based on EIA mythology and professional judgment, which is not applicable to the area.

There is no considered opinion with a inner knowledge of the locality. It is noted that David Lock and Associates Limited are based in central Milton Keynes and Milton Keynes is renowned for its "**concrete cows**" in its fields.

This document is not very comprehensive and consists of a considerable amount of supposition and is not suitable for a document for planned expansion of a New town in this instance

## **SYNOPSIS Cranbrook Expansion David Lock Associated December 2014**

It is stated that in the immediate vicinity of Cranbrook there are a number of other development sites that are closely related to the new community. This is not evident.

2.4 The subject of the three outlined planning applications is primarily agricultural land that has been used for some hundreds of years.

2.6 The southern expansion area is bounded very closely to the recently constructed Cranbrook Phase I and it is close to Exeter Airport to the south.

2.8 To the east lies open agricultural land and beyond that, the village of Whimple. The western expansion area does not deter greatly from Devonshire heritage, but the eastern area most definitely will.

3.1 It is difficult to see how the expansion of Cranbrook is the most sustainable means of accommodating new housing in East Devon and Exeter Housing needs. Why not extend between Exeter and Exeter Airport rather than infringing on historical agricultural land.

4.1 Social economic. It is stated that there are no significant adverse social or economic effects predicted. Within the eastern expansion there will most certainly be very adverse social affects within this area, and will rip up the rich historical agricultural history in that area.

4.2 It is stated there will be moderate beneficial affects to the local economy. How will it have any beneficial effects in the local economy when the farm land has **been concreted** over.

The emphasis is on new pedestrian and cycle routes. Nothing is mentioned about the existing road system in this scheme. The key component is noted as a transport migration measures which means nothing.

5.7 A claim is made that the impact of housing not being delivered at Cranbrook would be to place additional housing across East Devon. This is not logical.

There seems to be emphasis within this report on non car travel and that walking and cycling will be encouraged. The commercial reality is, if you want to earn your living and obtain communications quickly, you use the road and rail service. You do not go by bike.

Any development should be within the perimeter of any existing town which is sustainably in its own right and can assist the development of new housing where there is a proper train and road links in place. This New Town does not have this

## SYNOPSIS: Cranbrook Expansion

4.3.1 It is confirmed you will be delivering a town with identity and character. There is no substantiation of this in any of the documents that have been put forward for consultation.

4.41 It is claimed that there has been consideration of design at early stage in the development process that allow certainty for developers. The only certainty for developers is profit! There is no consideration of design whatsoever or any consideration to the construction of properties that will fit in with the surrounding history and agricultural land of this area.

8.2 This area is prominently rural in character. How can this New Town assist this character without damaging it severely. It consists of farmland, hedges, trees, watercourses and farmsteads.

8.3 It is disputed that this area has no direct relationship to the attractive landscapes of the Blackdown Hills and the areas is not an attractive landscape of scenic beauty. Please refer to (Great Walks in East Devon by Chris Harwood). This development will cause significant harm on wider landscapes.

8.4 The proposed development areas are tranquil and special, with distinction. A development which consists of 4,120 new properties will have no character distinction at all.

8.5 This development inevitably will have landscape and visual impact. There is no mention of proposals that would reduce adverse affect.

8.6 It is stated that the proposed expansion area would add to the impact with the already consented Cranbrook development. The existing development is known locally as **Crimebrook** not Cranbrook for a very good reason as it is an isolated bland development with no character whatsoever.

9.1 Ecology; It is disputed that there will be few negative impacts on any species or habitats within this rich farming community. Will concreting over agricultural land be good for this ecology impact?

10.1 Cultural Heritage. It is stated that there will only be a minor adverse affect in loss of field boundaries and other historic elements. Emphasis is made on cycling People have cycled along the surrounding farm land lanes for years. This is going to be removed.

10.3 The report brushes aside the listed Tresbeare Farm and Lower Cobdens Farm and that enhance management can reduce residential residual effect. This statement has no content.

## **SYNOPSIS: Cranbrook Expansion**

11.1 Agricultural and soil resources. It is stated that the affect of land loss will be beneficial in relation to the impact of business since the sale of land would be beneficial to land owners. This would be a great loss to the countryside.

11.2 You state that there is versatile agricultural land within this development but that the scheme will only have a moderate affect due to the sensitivity of the land grade. Loss of soil function can be managed by good soil management policy. There would not be any, as there would be no fields.

12.3 Water Resources. Makes no practical technical argument whatsoever with reference to the implementation of the above outlined mitigation other than you say the affects will be negligible. There are no facts in this statement.

16.4 It is denied that significant beneficial effects are substantial, significant and affects are limited. Any beneficial benefits outweigh adverse affects. This document recommends a horizontal development which is greedy in land, has high intensity housing with a poor design implementation using towns such as Harlow as an example.

## **Documents**

### **Cranbrook Expansion**

#### **ALLOCATION FOR LAND NECESSARY FOR DEVELOPMENT INCLUSIVE OF KEY EVIDENCE**

This document appears to be a collation of key evidence documents for perusal.

## SYNOPSIS: Allocation for Land for Development

2.2 It is stated there will be a second Cranbrook Station. The existing one is not fully sustainable due to the poor existing train service between Exeter and Waterloo which only runs one single track with outdated rolling stock.

2.4 The emphasis is on a new healthy New Town which will form a focus for the town and is aimed as being a sustainable place which is healthy and economically successful. The existing scheme which has been built most certainly does not do that, and cannot see how the new scheme will be any better. It will be significantly worse with disruption of the social structure in this rich agricultural heritage of the area.

3.1.1 There is recognition that the existing train service is only a single track. There will not be increased frequency by a passing loop in the Cranbrook area which will make this railway service any better. The problems with the rail service are now critical and need a complete upgrade. At present the existing service will not be able to cope with an expansion of Cranbrook.

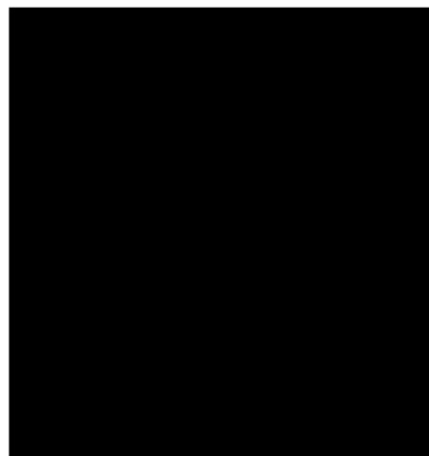
4.1.1 It is stated that as part of the healthy New Town designation, there is an opportunity of building a healthier place. There is nothing healthier than open farm land managed by farmers that have been there hundreds of years. It is denied that you will be building a healthier place, as you propose building an estate of high density housing of ill design.

**HAVE YOUR SAY!**

**CRANBOOK PLAN: PREFERRED APPROACH 2017**

**QUESTIONNAIRE:**

**DUE DATE MONDAY 8th JANUARY 2018**



Date 3<sup>rd</sup> January 2018

## **Cranbrook Expansion**

### **Recommendation**


Some 1800-1500 houses have been completed at Cranbrook at the end of 2014. It is my opinion that this is the maximum that this area can contain without damaging the locality of the surrounding countryside and farming community without capital expenditure on infrastructure first.

If a New Town is to be constructed it is essential that it is in keeping with the surroundings and the heritage of its location. A mass open market development in this part of East Devon is inappropriate.

I would recommend a smaller development expanding the existing Cranbrook Town but not exceeding 1500 homes, once infrastructure is put in place.

To reduce the increased average density to that in keeping with the locality. Additional density is not a tool for increasing the level of quality in street activity in this instance.

Peter Boekman MICOB. FCPA



## **Cranbrook Expansion**

### **Conclusion**

This proposal for the Cranbrook Plan Third Approach is defective. If something is defective you do not put it forward because it's bound for failure.

I will define the deficiencies in this document as follows:-

1. The design briefs and documents prepared for this New Town is inappropriate for its location in East Devon.
2. No consideration whatsoever has been made to rural farming and community
3. There is no concise recommendation of why a New Town such as Cranbrook is required in a rural area of merit over and above extending an existing established City such as Exeter.
4. There is no explanation as to what would be implicated in the form of road or rail services to sustain a development proposed. There is no semblance of coordinated transport planning by the Ministry, with apparently separate competing departments for air, rail, road and sea transport. On the one hand it is a sensible for electric cars to cut atmospheric pollution, while on the other it arbitrarily cancels long awaited rail electrifications like Cardiff to Swansea with specious excuses. There is a 20- year back log and order book for all UK rail engineers, which affect any small rail projects for superior cross-effectiveness such as Exeter to Waterloo.
5. The development plan proposes a design allocated with high density residential complexes with facilities and green areas around the perimeters. This proposal comes under a classification of a 'Tower block' development being constructed horizontal.
6. I cannot foresee anyone in the local area of Whimble, Broadclyst or Rockbeare that would want an expansion of Cranbrook if the full facts are known.
7. Local participants appear to be unaware of the exact contents of your proposals.

## **Cranbrook Expansion**

### Transport and Movement

Is encouraging a model from private cars, where you have no bus service and you have no proper rail service and a moving framework for cyclists and public transport. You cannot contemplate building a development of this kind without improving your road and rail service. There is nothing in this document to say that this will be done.

### Landscape and visual impact

There is nothing at all in the document in supporting any evidence improving the landscape and visual of this development.

### Land to the West (Blue Haze)

There is nothing that is meaningful other than stating the high quality features are retained. How can you do this? When you are building new houses in a visual landscape.

### Land to the South (Treasbeare)

Changes within the part of the wood would be less noticeable.

### Land to the East

You confirm that changes would be difficult. There would be a high level of feature loss.

### Land to the South East Grange

You do not state how you will be mindful of high quality features within the parcel. I do not consider the green wedges proposed are sufficient in any shape or form.

## **Cranbrook Expansion**

### **SYNOPSIS: Cranbrook Preferred Approach**

1.4 The Master Plan confirms that it will accommodate 4000 new homes in proposed extensions of Cranbrook, with design principles. I cannot see any evidence of design principles in this scheme

#### Land to the West (Blue Haze)

The character of this parcel has been assessed as having a low landscape sensitivity other than trees. If an extension of Cranbrook is to be made, it should be within this area and no other.

#### Land to the South (Treasbeare)

This is within the vicinity of Exeter Airport. If development is to take place on a small scale it would be suitable.

#### Land to the East (Cobdens)

This area is highly sensitive to change and will be difficult to reciprocate. Why build on it when you know the affect will be adverse.

#### Land to the South East (Grange)

It is admitted that any potential development would need to be mindful of the high landscape features. There is no evidence within this document that this will be made.

### 2.8 SANGS The Master plan identifies potential land for sangs

This development plan is very spread out with areas indicated for future expansion. There is note within this plan of potential "Sangs". I have been informed that these areas are green belt wedges between the three villages throughout the development. These wedges are only provisional.

3.1 **DESIGNED PRINCIPLES** You have high density mix use development within a New Town centre on average densities around 40 BPH with higher densities focus on neighbourhood centres. Why are you proposing a scheme with such high density and not emphasizing the quality of new design which would have a lower density mix. The designed principles you referred to included examples such as (New Hall) Harlow, Upton West Northampton, and Thicket Mead Midsummer Naughton. Lime Tree Square in Street. Is this the preferred approach quoting these poor examples of rural planning? How can you recommend a development take place with these designs as a basis for a new development which has been found to have severe limitations in practice? The developments recommended are an example of having no resemblance to the character of the proposed area. If a development is to take place it must have a designed input which is creative, high quality, and blends in with the locality. This plan certainly does not.

## **DOCUMENTS**

### **The Cranbrook Plan Preferred Approach October 2017**

This document is very vague as to its actual content. Within its opening pages it states that the New Town will comprise 6,300 new homes. Within its allocation under DPP options and reports, the number of homes is stated as being 7,500. Under the master plan it confirms there are 4,000 new homes.

The report contains various statements such as 'identity and legibility with a wide strategy to set cultural and design coding to promote local distinctiveness, walkable neighbourhoods and identity incorporating linkages to surrounding development areas'. These statements do not have any practical meaning.

This document is utterly unsuitable for a proposal that is meant to incorporate a New Town with a 20,000 proposed population.

There is mention of a report landscape and Visual base line (Hankinson Duckett & Associates 2017). This important document is not itemised separately within its content in this report.