

**A report on the**

# **Cranbrook Local Plan 2019**

A supplementary submission regarding; matters, issues and questions identified by the planning inspector for examination.

## **Opener**

*“Towns should be established and developed as self-contained and balanced communities for work and living.”* Lord Reith, Chair Advisory Committee on T&C planning,

## **National Planning Policy Framework (NPPF)**

In my view based on research and evidence that the Cranbrook Plan is not positively prepared, justified, effective and consistent with NPPF.

## **Submission**

The following issues raised are based on my original submission; *‘Building for the future’* April 2019 – **Ref, 142** plus my own **Cranbrook Report**. The responses relate to the Issues and Questions you have raised.

## **Matter 16 Specific Polices**

### **Q188 – Energy Standard**

Building Regulation need to be more robust and stringent, plus exemplary inspection protocols.

Ref. CR/Section 20

### **Q199 – SANGS / Clyst Valley Regional Park**

These areas are a vital element of the master plan. They provide recreation space and bufferzone between surrounding villages, e.g. Rockbeare and Whimble, avoiding coalescence, linked to the natural agricultural landscape. The importance of protecting these areas should be as robust as Green Belt legislation. It should never be considered as potential development land.

Ref, CR/Section 21/Part 2

## Summary

The concept of 'developer led' New Town creation is flawed. No more; mundane, mediocre, middling estates with unsatisfactory infrastructure.

Any scheme must protect surrounding villages from inappropriate development and that life can coexist as distinct, separate sustainable communities. People make places and 'localism' at the heart of developing neighbourhood/master plans.

Chris Patten (1989) became an advocate for localism; he stated; *'many of the important choices are decisions which should be made locally, to reflect the values which local communities place on their surroundings'*.

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Date – 31<sup>st</sup> December 2019

# Cranbrook Report

Developing our future  
Protecting our inheritance

Report prepared for the Examination Stage of Cranbrook  
Master Plan and its associated documents by

Alan G. Lascelles.

Infrastructure is about investing not to solve the problems of today but to anticipate the issues of future generations

Norman Foster

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## **1 Introduction**

Whimble and Rockbeare are two distinct Devon Villages on the eastern side of the Historic City of Exeter. These Villages are cited in the Domesday Book of 1068, both connect with the Roman Road to London and both have a strong agricultural history, especially Cider Making.

Whimble has grown into a sizable sustainable community surrounded by a landscape of rolling hills, woods, mixed agriculture, a network of farmsteads and streams. These villages are being threatened by the development of the new town of Cranbrook, which is a 'Developer led' new town. There has been a chronic lack of effective town planning and local influence / localism. The Town Council is a Consultative body with limited powers and the EDDC (East Devon District Council) is restricted by policy of Central Government and its own political ideology of MP's and local Councillors.

## **2 Background**

Linked to the consultation in March 2019 regarding the expansion to the East and South of London Road, in April 2019 a group of extremely concerned villagers took it upon themselves to take action with a 'leaflet raid' on our village, which has proved to be very effective in generating a massive response to the consultation numbering at least 500 replies sent to East Devon District Councils Planning Department.

I, along with other residents have made a significant impact in the Parishes with a positive approach to achieving change, through campaigning and public awareness, but hopefully working constructively with various appropriate statutory bodies and the voluntary independent sector, together with all interested parties, including our local parish council our neighbouring parish of Rockbeare, Cranbrook Town Council, EDDC and Devon County council and other relevant Groups.

A group was set up to add to the activates of the local parish councils of Whimble and Rockbeare to provide a united coherent approach against, what is a perceived to be a dereliction of duty to follow the National Policy Framework in the development of Cranbrook New Town.

The expansion from the original scheme it seem obvious from the Sustainability Appraisal 2017 that the New Town is going to grow into a much more substantive Town, because of the government policy which has been forces upon the EDDC.

It could be argued that the New Town has had no clear direction, built in an 'ad hoc' manner without high quality design and build criteria. The elongated, ribbon development does not form a coherent whole for establishing a new sustainable

community. Furthermore, at present it is acting as an Exeter suburb due to lack of local employment, lack of amenities, lack of recreational / leisure activities and no focal point for the new Town. There is no Town Centre. Cranbrook does not conform to the National Planning Policy Framework.

It is worth taking a fresh look at History. To look back at what the founding father of new towns and garden cities, Ebenezer Howard stated: The Garden City, as Howard defined:

*“it is not a suburb but the antithesis of a suburb: not a more rural retreat, but a more integral foundation for an effective urban life.”*

In October 1945, the Minister for Town and Country Planning appointed an Advisory Committee under the Chairmanship of Lord Reith. He stated,

*“Towns should be established and developed as self-contained and balanced communities for work and living.”*

*“Self-Contained’ meant that people who lived there would have jobs there and all necessary shops and other facilities. ‘Balanced communities’ meant that all sorts of people would live in the town from Managers to unskilled labourers.”*

Critically, Garden Cities, 1950’s New Towns and planned new communities have evolved over time and that learning and insight have taken place in order make new settlements fit for the 21st century, but still have regard for the values and utopian vision expressed over one hundred years ago.

### **3 National Planning Policy Framework**

The fundamental requirement for development is that it ties in with the globally accepted definition of sustainable development *‘meets the needs of the present without compromising the ability of future generations to meet their own needs’*

The planning system has three overarching objectives in achieving ‘sustainable development’, which are interlinked and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The key issue is whether the development of the New Town of Cranbrook meets these needs. It is my view and members of the group, that it falls significantly short of these national guidelines. This shall be explored in the following chapters.

## **4 Green Town**

The new community of Cranbrook was seen as a prototype for a new Eco-Town that former Prime Minister Gordon Brown wanted to see built in future. The pressing need was for the highest possible standards of sustainability and renewable energy usage on the green-field development near Rockbeare, with its own railway station.

Originally when the developments at Cranbrook were first being designed, there was the intention to make it a ground-breaking low-carbon community, and a model for future urban developments to follow. In addition the guiding principle by the planners was for Britain's first eco-town' and to be committed to 'good design'.

Cranbrook has lost its opportunity to take the lead as a prototype New Green Town and living a more sustainable future. Is Cranbrook a dormitory town for Exeter, devoid of community facilities?

In 2007, according to Richard McCarthy, Director General of Programmes, Policy and Innovation at the Department for Communities and Local Government, at a Growth Summit linked to a Government Green Paper on Housing. Mr McCarthy said, *“We must not overlook the need for good design of both homes and communities, the urgent need for the highest environmental standards and lifestyles, and an innovative approach to transport provision”*.

It is evident that the dream has not met reality!

## 5 Housing

### 5.1 Demography

There is a mix of housing with a strong uptake in the 30 / 40 age group. There is one facility planned for a residential / nursing home, in the near proximity of the Town Centre. There are also no bungalows, retirement homes, and extra-care housing. In addition the new town has experienced a significant rise in birth rate. The needs of citizens as they 'grow older', people migrate out and move in, must be an intrinsic part of the master plan. Critically, the Town needs to be 'Future proofed' as a key element in building a master plan. Ref. comment by Norman Foster Page 3.

### 5.2 Tenure, dwelling size and estate layouts

The policy is to provide various sizes, type and tenure of housing needed for different groups including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes. However, is this being achieved?

Britain's new-build homes are the smallest in Western Europe and many are too small for family life, according to a 2011 report by the Royal Institute of British Architects (RIBA). The key question for planners is what type of future we are developing in the construction of new estates. RIBA estimates the floor area of the average new three-bedroom home in the UK is 88 sq. m (947 sq.) - some 8 sq. m (86 sq. ft.) short of its recommended space. It is vital that detailed plans are evaluated and questioned, as well as 'demanding' better designs and adherence to recommended space criteria. It is a statement of fact that some of the new build in Cranbrook has a density greater than that of parts of Victorian terraces in London.

According to the National Policy Framework (NPF), *'the designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them'*. This part of Devon has a long history of fulfilling agricultural needs of this part of the country. It is clear that significant numbers of residents and organisation advocate green spaces on land to the East of Cranbrook within the Town boundary; this may include use as sports and recreation purposes. As prescribed this policy for managing development within a Local Green Space should be consistent with those for Green Belts.

The estate layouts and width of highways does not allow for the efficient delivery of goods, and access by service and emergency vehicles, contrary to the Nation Policy Framework.

It is also very clear that in modern housing estate layouts by the mega builders, privacy and being overlooked is not high on the criteria of housing estate layouts. Much more effort should be taken in design to mitigate this problem. It is noted that some of the smaller developers with competent architects have played an important part in creating a more positive environment for safe, secure and private outside space.

It is of significant note, and especially at inspector stage, that according to the Campaign to Protect Rural England the predicted population growth may be in error in terms of the needs of housing in the future – current forecasts have over predicted. This is evidenced in the reduction in the rate of construction in the current phases of Cranbrook.

The last key point, although not strictly part of the reports remit is the building of Council Homes. The 2019 Stirling Price has for the first time given the top aware to a development of Council Houses in Norwich, with a clear focus on design and 'green' credentials.

### **5.3 Population growth & Housing forecasts**

Existing local infrastructure is not significant enough to cope with an increase in population such as the size of this development. The development will put additional pressure on local GP services as well as local healthcare provision such as dental surgeries and hospitals.

A major cause for concern is that the only GP Surgery in Cranbrook is threatened with closure unless a new contract is delivered. This highlights the fact that new housing development must come with all the appropriate amenities, rather than link to exiting villages and Exeter suburbs.

The National Policy Framework clearly favours developing previously used land. There are already enough identified 'brown field' sites in and around Exeter and the rest of Devon to allow the construction of more than 14,400 houses, according to a Campaign for Rural Development report in 2018. This includes 337 brownfield sites in Devon totalling 900 acres available.

To achieve the stated aims of protecting our countryside and the visual appeal of our county, surely any identified need for additional housing should be met by ensuring that the brown field sites that have been identified should be built on as a higher priority. Hence one might reasonably question if all the land now identified and

proposed to become part of Cranbrook would actually be needed, and hence whether the Cobdens and Grange developments are actually required. If not now – when would demographic studies indicate further expansion of Cranbrook or alternative sites in the Exeter Region?

#### **5.4 Density and Design elements**

The National Policy Framework emphasises that opportunities to promote walking, cycling and public transport use are identified and pursued. It also specifies that high quality walking and cycling networks and supporting facilities such as cycle parking.

The NPF states the importance of securing well-designed, attractive and healthy places. This is open to an aesthetic debate on what well-designed means. Planners and architects would argue that Cranbrook is limited to a small number of house styles from a core 'national design book' from a few national house builders, using only three or four external paint colours.

Example from around the country have provided good, high quality design at a high density, but this is not the case in Cranbrook. Planning officers for the EDDC are also aware of this fact, but hands are tied. This year's Sterling Prize for Architects announced on the 8th October is a salient point. *"A modest masterpiece"* is how the RIBA Stirling prize judges described the project, designed by London firm Mikhail Riches with Cathy Hawley, representing *"high-quality architecture in its purest most environmentally and socially conscious form"*. This should be the aim of both social housing and private ownership.

Here the NPF is very clear, stating; *'Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'*. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process. This is not happening in East Devon, as the developers / consortium players, carry too much weight in the decisions making process. This view has been expressed by a Senior Planning Officer of EDDC.

It is essential that in the establishment of the Neighbourhood plan for Cranbrook, high quality design, estate layouts and landscaping should be paramount, with more individual housing stock, a more vernacular style reflecting a more 'Devon feel' and a 'suitable degree of variety' – these special qualities of each area should be specified and be reflected in further development including, approved details such as the materials used.

In the submission made by Cranbrook Town Council have specified a need for, *'a wide range of well-designed homes'*. Although desired' it's just not happening so far!

### **5.5 Build Quality**

Local press reports have continually highlighted dissatisfaction with the build quality in Cranbrook. Houses were supposed to be built in a way that reduces energy usage, such as ensuring plenty of insulation to reduce the need for heating, but in practice this ideal has not been followed as it appears that the Persimmon Homes have lowered standards to reduced costs, focusing not on customers / purchaser, but on overall profitability substantially limiting their 'green' credentials. It is understood that one house builder has removed its Quality Management Team.

### **5.6 Vernacular Architecture**

Lack of use of vernacular architectural styles, which have a true East Devon character (New Red Sandstone). Most of the architecture so far could be seen anywhere in the country. This is a major criticism of the development of the town so far. Only historic buildings echo to the geological structure beneath.

There is insufficient distinction between developments in the overall towns urban landscape. There appears to be a semi – monopoly on the principle contractors using a limited catalogue of designs and architectural styles. New planning permission must have higher design standards, which as part of the 'consortium' team the East Devon County Council are not delivering. In future there needs to be an insistence strong detailed design code. The Master plan document has insufficient information on Design Code which is fundamental to the creation of a new community, of a new place to live and a new place to work and 'play'. There is also a lack of national house builders involved and only a few small houses builders and no self-build plots. More builders, large and small, leads to a more diverse built environment.

Due to the lack of local Government control as confirmed within Sustainability Appraisal 2017 it has become a 'free for all' for all developers. Sir Oliver Letwin MP, Independent Member of Parliament for West Dorset review published in the Sunday Times on the 6th April 2019 which states that,

*'one of the fundamental problems with house building is the larger developer, that dictate design and the cost of building with no input than that of contained within statutory requirements'*.

## 5.7 Housing Design Examples

The Master Plan Document indicates some good examples of urban architecture. In particular; Upton - West Northampton, Thicket Mead - Midsomer Norton, Lime Tree Square - Street, New Hall- Harlow and Sherford - Plymouth.



Thicket Mead, Midsomer Norton, Radstock, Somerset



New Hall, Harlow, Essex

Upton, West Northampton

Clearly, good design can be achieved, but it is less likely to happen unless, a) More house builders are involved, with a great variety of designs. b) More innovative and creative designs c) The planning officers negotiate higher design standards and are supported by councillors. A further example lies in the suburb of Newhall, Harlow for its high density but with tree lined boulevards. There is only a token gesture in the development of Cranbrook.

Although there has been some opposition to Poundbury in Dorset there has also been considerable praise. Some appropriate design styles used in Poundbury could also work in Cranbrook.



Poundbury, Dorset



Goldsmith Street, Norwich

### 5.8 Estate Layout

In many estates the layout was considered to be as important as the design of dwellings. The ‘close’ was considered as a tried and tested way of being able to know ones neighbours. Social scientists have suggested small closes, where it is possible to know each of the neighbours, which does not happen in long streets. The new town of Cambourne in Cambridgeshire has included many developments with closes in line with the founding fathers of town planning. These types of layout should be considered favourable in new developments. According to Emrys Jones, former Professor of Geography at the LSE, *“A neighbourhood means differ things to different people; to the sociologist, an area in which people develop face to face relationship.”*

One crucial additional point, is due to the exceptionally high density of housing in Cranbrook, the closeness of properties and lack of privacy, ‘cheek by jowl’ with neighbours, which according to many Social Scientists has a detrimental effect on health and wellbeing and the built environment.

### 5.9 Affordable Homes

It is evident that developers are managing to dodge building tens of thousands of affordable homes in rural areas where they are most needed because of a the inadequacies / loopholes in planning laws, according to research by the homeless charity Shelter and the Campaign to Protect Rural England (CPRE)n 2018. While developers are required by local authorities to provide a proportion of affordable homes – often about 30% – in any new development, many use “viability assessments” to negotiate down the number by arguing that the requirement would adversely affect their bottom line.

According to the Guardian article, Saturday 3rd March 2018, *“In one example, a land promoter succeeded in eliminating affordable homes from a Redruth scheme on the grounds it was not financially viable, reducing the quota from 40% of the development to zero”*.

In the second major phase of Cranbrook only 15 per cent of the residential developments within the built-up area boundary of Cranbrook will be affordable houses, compared to the 30 per cent for the first phase of development, in order to make the plan viable to developers. This may vary, but as it stands at present there will be a lack of affordable homes in the eastern and southern expansion of this new town. It is argued that this is due to the excessive powers of the developers. According to the national policy framework states that, *‘sufficient number and range of homes can be provided to meet the needs of present and future generations’*.

According to the ‘Planner’, July 2018, The Local Government Association (LGA) has said that the definition of affordable housing in the updated National Planning Policy Framework (NPPF) must include homes for social rent. This would help to tackle the low number of social rented homes across the country, explained the representative body for councils in England and Wales.

It noted that in the revised draft NPPF, the reference to social homes had been removed from the government’s definition of affordable homes while it includes *“starter homes and other, less genuinely affordable, forms of housing”*.

Judith Blake, housing spokesperson for the LGA (Local Government Association), said: *“Councils are determined to ensure that their residents have access to affordable housing. By removing social rent from the definition of affordable housing, the government has effectively removed the tool to help that happen”*.

A further issues, according to Ken Worpole an academic on Architecture, Planning and Social Policy has stated, *“The great issue for public policy now is to choose whether to regard the growing population of older people in the UK as a medical/custodial ‘problem’ or as a civic issue –how we keep older people integrated into the life of the community”*. A re-emerging solution, which is rooted in the past of social history, is the construction of Almshouses for the elderly at affordable rents. This is clearly part of future proofing plans for Cranbrook – there is little evidence so far on matters to deal with the elderly.

## **5.10 Extension to Cranbrook**

According to one resident, 'East Devon District Council (EDDC) appear to be repeatedly contradicting earlier versions of plans (see below), and originally we were categorically told that there would be no development south of the B3174 London Road and nothing any further east than roughly level with the London Road/Gribble Lane junction. So neither the 'Cobdens' development nor the 'Grange' development were part of the original plan, and this is rather worrying as the latest plans make it appear that Cranbrook will almost be coalescing with the historic East Devon village of Whimble.' Clearly, local feelings around Whimble are running high, and the people of the village are fighting to retain its unique and historic character. It is worrying to note that in the Cranbrook Town Council Submission, in relation to the 'Cobdens' extension - The proposals for this area are broadly welcomed. In respect to the 'Grange' estate - The revised proposals for this expansion area are broadly welcomed, particularly the removal of the proposed development within the Rockbeare green wedge. These extensions are not welcomed by residents of Whimble and Rockbeare.

The residents of Rockbeare, Whimble and Broadclyst have a 'legitimate expectation' that, as previous plans were made public, these extra developments should not take place. It is absolutely clear that this incursion is opposed by a large group of residents, as are any modifications subsequently submitted without due public consultation.

## **6. Non-permanent Housing**

### **6.1 Gypsies and traveller**

The National Planning Policy Framework acknowledges that policies should, review of the functioning of existing Gypsy and Traveller sites should be undertaken before allocating new, edge-of-settlement sites that encroach into the open countryside as does in the Cobden Estate - CB4. East Devon District Council should therefore demonstrate that it has undertaken full, robust and proactive investigations of the options including detailed site assessments. Before allocating new Gypsy and Traveller sites within the Cranbrook Area as a whole. The council should have provided evidence that they have robustly sought to identify all alternative options for the intensification and expansion of existing sites and through the provision of local authority and RSL (Commercial residential site company) owned and managed sites first.

Planning policy for traveller sites August 2015 sets out the Government's planning policy for traveller sites, which should be read conjunction with the National Planning Policy Framework.

In the case of the Cranbrook Master Plan, the siting falls short in terms of Planning Policy, specifically on the following sections:

*Policy B - Planning for traveller sites*

*e) Planning policy for traveller sites provide must give proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development*

The new location wholly within the parish of Whimble is dissected by overhead Power Lines which has serious implications for residents in its proximity. There is a profound logic against development of green wedges / open countryside; as it would destroy attractive green space affecting mental and physical health, and cause a coalescence of the two communities of Cranbrook and Whimble.

*f) avoid placing undue pressure on local infrastructure and services.*

The site is also inappropriate due to the lack of schools and local GP services, transport, local amenities and general infrastructure: Whimble School is at capacity, unless a new school was built and according to local councillors there are no funds available to undertake this task.

*g) do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans*

The area of the Gypsy and Travellers Site is within a the flood plain of one of the tributaries of the River Clyst as indicated on the Goc.UK. Flood Map for Planning – accessed November 2019.

*Policy C: Sites in rural areas and the countryside*

*14. When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community.*

It is clear that East Devon District Council have a duty to facilitate the provision of 37 new gypsy and traveller pitches in East Devon between now and 2034, however, 10 new serviced permanent pitches, sited in an area of, at least, one 1 hectare, in the Cranbrook Plan area would amount to 27% of East Devon's overall allocation, 10 of which are to be located in the CB4 Cobden Expansion Area.

East Devon District Council has not had due regard to the protection of local amenity and local environment. As it has been outlined, the proposed Gypsy and Traveller sites in Cranbrook within the Parish of Whimble should not be sited on Green Wedge/open countryside. This shows a complete disregard and contempt to the citizens of Whimble

and Rockbeare, the local environment, adverse visual impact on the landscape and by the amenities and local infrastructure. In addition, the evidence that EDDC have used to establish accommodation needs are out of date and relies on information relating to 2014.

EDDC, who, after providing no reason or evidence, have decided to sacrifice, designated Green Wedge for the purpose of constructing the proposed Gypsy and Traveller sites and further housing. This is sandwiched between Cranbrook and Whimble and part of Rockbeare.

Clearly, government policy states that Traveller sites should not be within green belt Under s 4(k) of the Planning Policy for, the Government's aims in respect of The failure to comply with this section contradicts the obligations under section 19(2)(a) Planning and Compulsory Purchase Act 2004.

According to the 'revised' Cranbrook Plan, 2013 – 2031 and not as indicated in the original 'Preferred Master Plan' there is provision for 10 serviced permanent pitches for gypsies and travellers on an area of land of at least 1 hectare. The proposed site is poorly positioned for travellers to use local facilities, a location to the west of Cranbrook would be more appropriate. The cultural element to traveller's way of life is to favour the verges, lay-bys over designated sites. This is evident in the case of a new 'unused' site in Axminster. Whimble is a small village which already has a permanent site within the Whimble Parish Boundary and it would be unreasonable when the District Council is so large it could easily accommodate sites more fairly across this part of Devon. It is realistic to argued that the development proposals could destabilise the hamlet of Hand and Pen and the village of Whimble.

According to Alder King, Planning Consultants, which takes the view it seems excessive, and will impact upon the delivery of the expansion area, and certainly does not represent a balanced approach to gypsy and traveller site provision throughout the district. In fact the 10 pitches to be secured on the eastern extremity of the Cobden Expansion Area, would undermine the principles of Local Plan Policy H7 which states that, *"permanent sites should be conveniently located for access to existing community services and facilities and within 30 minutes travel time by public transport, walking or cycling of a primary school"*. The proposed CB4 gypsy and traveller site does not appear sustainably located and at present is shown to be located on the eastern extremity of the Cranbrook Plan Area and its allocation boundary. Furthermore, part of the site actually falls outside of the proposed 'CB8 Built up Area Boundary' of the Cranbrook boundary, as indicated on the preferred Master Plan.

This conflicts with criteria 6 of Local Plan policy H7 which states, *"in respect of proposals outside built up area boundaries, the local East Devon need has been proven and cannot be met elsewhere in the District"*.

This conflicts with the National policy and guidance by EDDC, Gypsy and Traveller Site Assessment Methodology, August 2015, that, Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies:

- promote peaceful and integrated co-existence between the site and the local community
- promote, in collaboration with commissioners of health services, access to appropriate health services
- ensure that children can attend school on a regular basis
- provide a settled base that reduces the need for long-distance travelling and possible environmental damage caused by unauthorised encampment
- provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development
- avoid placing undue pressure on local infrastructure and services
- do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans
- reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability. “

There is no justification or evidence provided by the council as to why area CB4 is the most suitable location within the Cobden Expansion Area or the wider Cranbrook Area generally, and why other sites elsewhere could not accommodate the pitches without the consequent impact that this allocation within the wider Cobdens area will have.

The more logical site would be in area CB3 Treasbeare Expansion Area appears more integrated into the new proposed development and certainly more accessible and in closer proximity to the existing Cranbrook facilities and settlement. However, this is within the Parish of Broadclyst. The proposed gypsy and traveller site within CB4 which has been relocated in the latest plan – which was not subject to public consultation, should be relocated to reflect better integration within the wider urban extension or there should be flexibility for provision elsewhere.

On the 21<sup>st</sup> September 2015 Whimble Parish Council’s comments in respect of a consultation on East Devon District Council, Gypsy and Traveller Plane: stated that, *‘Whimble has 3 sites. Whimble is providing adequate spaces but travellers don’t use the facilities, instead choosing to stop on the road verges. As there are adequate sites*

*in the parish no further ones are required. EDDC should encourage travellers to use the designated sites'. It is important to respect that Gypsies and Travellers live a transient life style.*

East Devon District Council should therefore look for a transit site, ideally placed and managed by them directly or a suitable provider, to deal with temporary encampments, not large permanent sites which go against their desire for extended family sites. There are also Brownfield sites available which should be used ahead of Greenfield sites. The proposed location for the Gypsy and Traveller site shows no evidence of consultation with the Gypsy and Traveller community thus failing to accord with Ministry of Housing, Communities and Local Government guidance.

Of note Cllr Kevin Blakey, previous Chairman of Cranbrook Town Council who stated: – *“that the proposed gypsy and traveller policy is deeply flawed and must be taken back for reworking.”*

## **6.2 Summary**

In summary, the Cranbrook Plan documentation does not provide sufficient, if any, evidence why the locations shown on the masterplan are the best option for new sites and best options for the Traveller and Gypsy community. There is no apparent evidence in the Cranbrook Master plan that information has been extracted from the *'Gypsy and Traveller Liaison Service'* of Devon County Council, which provides support and advice to both the settled and travelling community. In addition there is no evidence to indicate that EDDC have effectively engaged with either the settled community or the traveller communities in regard to the proposed location of this site, especially as the site has been relocated from the ordinal Master Plan of Cranbrook.

Furthermore, if the Council are serious about provision of permanent pitches then using local authority owned land and direct/provider management is probably the best way forward and not developing an inappropriate site in a 'green wedge' area.

## **7. Public consultation?**

The four extra estates of Treasbear, Bluehayes, Cobdens and Grange were part of the public consultation process regarding the 'Preferred Approach Master Plan' 2017/8 and as far as we are aware is the basis on which submission to the consultation processes were made.

However, the plan submitted to the inspector is significantly different from that which went out to public consultation – the plan has had major amendments especially

towards the boundaries of Whimple and Rockbeare. There is a view, that the entire consultations process should be 'null and void'. A housing block is now in the Parish of Whimple, as well as the enlarged Travellers Site. This was not part of the consultation and it is very clear, if this fact was known about at the time there would be more vehemently opposed by the community of Whimple. The impact on Whimple has now significantly changed, in what could be considered in an underhanded manner. It could also be considered that this is a result of the successful creation of the neighbourhood plan of Rockbeare.

In the Localism Act 2011 it has a requirement to consult communities before submitting certain planning applications. Whilst this is not an application it does, if approved, affect the likelihood of approval being granted.

The concept is to further strengthen the role of local communities in planning; the Act introduces a new requirement for developers to consult local communities before submitting planning applications for certain developments. This gives local people a chance to comment when there is still genuine scope to make changes to proposals. Local people have not had the chance, as the significant amendments have been conducted by EDDC, in back offices without consulting the public. This is a breach of trust and a challenge to its legal authenticity.

## **8. Comparisons – Cambourne, Cambridgeshire**

Cambourne and the current population are approximately 11,000. The town is often used by government departments and in human geography lessons as it provides a useful case study of designing and building a settlement from scratch. Planning permission for the development was given in November 1996, and construction began in June 1998. The first house was moved into in August 1999.

Clearly, all new settlements are in some ways a unique. The original vision of the master planners was to create a village environment with the facilities of a small town. The aim, like that of the planners of the garden cities and suburbs, was to provide the best of both worlds – the rural and the urban. In many ways Cambourne delivers this promise. It is a few miles from Cambridge and set in open countryside with short walk to fields and woods. Relatively close to main line railway stations at St Neots and Cambridge mainline. Over the years the town has built up a better sense of community. It is perceived as a safe place to bring up a family and young children seem to be given more freedom and independence than in Cambridge or established

villages. Houses are cheaper, there is more choice and the houses are new. According to research by Cambridge Architectural Research Limited, all people really appreciate the green space and lakes that have been incorporated into the town.

However, the lesson to be learnt is that in the new town according to the research group is that *'Cambourne can feel isolated, especially for those without children who have less opportunity to make friends or for those who find mixing more difficult. There is an obvious lack of history, a continuity of generations and a sense of belonging. There is less reason for civic pride, compared with Cambridge and some villages. There is less choice of shops, fewer public transport options and facilities were late in arriving. Schools are not sited ideally, but they have a very good reputation and this attracts new families'*.

One of the main issues was the lack of local employment opportunities. But it may be unrealistic to expect people to work where they live, even if there are more local employment opportunities. Over time the design vision of the master planners gets watered down and the original aim of creating a community can be lost. There is also huge pressure from developers to increase the size of the development, especially on green field sites when there is a great opportunity to maximise profits.

As a general view in Town Planning, new settlements, like Bourneville and Port Sunlight, had a clear ethical underpinning. Civic duty and co-operative effort provided the resources for communal facilities. Today the planning and development process involves bringing together conflicting interest groups and may lack this ethical framework and altruistic drive. How can a development of this kind foster this altruism and civic pride and develop a sense of place and community?

In Cambourne, sustainability was seen in the master plan as the solution that would provide this sense of purpose. Giving the development three separate village elements in the new town would help in give the settlement its image and identity. The researchers stated that, *'Cambourne is no more sustainable, in any real sense, than other parts of the region. Cambourne is an urban community divorced from its surrounding countryside'*.



### Cambourne, Cambridgeshire

The houses are of good design, imaginative and well-built and pleasing. Like Cranbrook, it is the people doing more than the local authority that are giving Cambourne a sense of community, which makes it an attractive and popular place to live. However, it worth pleading that the ‘bolt on estates’ do have a strong village feel with amenities that a village might have – this would assist in developing a sense of social cohesion.

## 9. Town Centre

*The National Policy stresses the need for the ‘vitality of town centres and Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation’.*

As part of the Master Plan it must clearly spell out that Cranbrook is a standalone development and not an urban extension of Exeter that ‘melts’ with other developments taking place in its eastern vicinity as part of a wider growth corridor. It is obvious that without a Town Centre peoples patterns for living are already developing in what is in effect a suburb of Exeter. The Town Centre would make a major difference to the well-being, economic sustainability and social cohesion. In addition, it would be a statement that Cranbrook is a Stand-alone community with a centre that would become the heart of the community. As Ebenezer Howard, the Father of Town Planning, would reiterate *‘this is not a suburb’*.

From the very beginning back in 2010, a Town Centre was considered a priority as since the original outline planning permission for the first 2,900 homes was granted. Only the Cranberry Farm pub has been constructed on the land and residential

development of the town centre allocated land has now taken place both east and west of the Town Centre, leaving a green field – as at September 2019.

It is clearly a planning problem that part of the land allocated for the Town Centre has already been built on. It seems that there is no ambitious vision for creating an exciting, creative and viable Town Centre.

It is also worth highlighting that a shopper's car park at Younghayes neighbourhood centre has also been built on - fact. It could be argued that the East Devon District Council has let down the new citizens of Cranbrook. Although there is a trend to online shopping there is a desire to visit retail / town centres which is still relevant for mixed reasons, including shopping, social, entertainment and being part of a defined community. A town of 20,000 inhabitants should be able to support 25 retail outlets.

It is not unreasonable to desire from a design perspective that the Town Centre needs to be designed to have the feel of a 'Devon Market Town' with architectural references to past styles and periods and of a strong scale. Of particular note is the new settlement of Cambourne in Cambridgeshire which has a good example of Town Centre architecture and plans for Sherford in Devon has a strong vision for the Town Centre.

To Bring life into the centre in a 24 hour society; there should be residential accommodation above shop premises, as per Younghayes centre, but unlike Younghayes to have more creative architecture.

An ideal Town Centre should have:-

- 1) A pedestrian main square, suitable for market holders, recreation, café society and open air entertainment.
- 2) A Theatre/Cinema/Arts centre similar to the award winning 'Beehive' in Honiton.
- 3) All level parking, free to use and in public ownership at rear of shops.
- 4) A medium size supermarket, other national chains and provision for a variety of independent shops, including an arcade, small lanes and kiosks.
- 5) An increase in the Public House provision and a possible Inn / Hotel, restaurants and fast food outlets.
- 6) The Centre should have a Town Hall that is designed to be a focus of civic pride – this would be significantly different from Younghayes.
- 7) Public Library and Town Museum/ Art Gallery
- 8) Be the primary Retail Centre for Cranbrook and the surrounding area.

- 9) Be of an outstanding design
- 10) Be a 'go to' place / destination of choice, for East Devon.

Shopping zones, civic spaces and pedestrian areas should be in Public Ownership as this gives full democratic ownership and accountability of these areas. Critically, it is important to get the Town Centre of Cranbrook under way within 2019 and plan to be completed by summer 2020.

According to recent published reports, the District Council is currently in talks with the developers to extend deadlines to start building a Town Centre. Although developers promised that the first five high street units would be built in the designated Town Centre area before 2,000 homes are occupied it is not happening. This highlights the folly of a 'developer led' town planning project.



Sherford, Proposed Town Centre, Devon

The number of completed homes in Cranbrook is approaching 2,000, with almost all of them (between 1,900 and 2,000) occupied. And, the land next to Cranberry Farm pub, designated for the Town Centre, is still mostly an empty field, except when a local 'fun fair' came to town.

There should be an insistence that no more development is started until the Town Centre is an active shopping location – not necessarily in its complete format. This will allow time to imbed shopping and leisure habits. Without proper development control, there is little faith in some quarters that building will not start for many years. The Town Centre clearly needs to 'emerge' sooner rather than later.

## 10. Green Belt

### 10.1 Principles

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

This is the desire, but according to a recent report thousands of homes are to be built in green belt land. One of the principal considerations is that Green Belt is to 'check the unrestricted sprawl of large built-up areas'. It is now a priority to designate land to the west of Cranbrook from becoming linked to eastern expansion of Exeter with the creation of an Exeter City green belt, although this may not be within the parameters of this individual Master Plan. However, the designation of a 'Green wedge' between the eastern and southern expansion of Cranbrook to protect Whimple and Rockbeare is essential. This is clearly to 'assist in safeguarding the countryside from encroachment' and protecting the distinct character of the villages.

In the National Planning Policy Framework (revision Feb 2019) it clearly states that; *'The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. Any proposals for new Green Belts should be set out in strategic policies, which should':*

a) Demonstrate why normal planning and development management policies would not be adequate;

It is not considered that the initial phases have been developed in a coherent manner and that the planners are hampered by the demands of the consortium. The green New Town was a representation when conceived, but in reality it is not happening.

b) Set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;

The new 'bolt on' suburbs, developing to the south of the old A30 and eastward provide evidence that there is a substantial change from the original new town.

c) Show what the consequences of the proposal would be for sustainable development;

It must be clear the Cranbrook is a 'stand-alone' sustainable community and there should be distinct green areas between Cranbrook and its neighbouring villages and hamlets. In order to achieve being a sustainable community, it must have the

appropriate infrastructure, employment, leisure, retail, recreation, health and educational facilities.

d) Demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas;

One of the five key remits of the Greater Exeter Strategic Plan is conserve and enhances the area's environment. This should include a limitation on the outward 'sprawl' of the urban areas of Exeter. As Desmond Heap (prominent Town Planner) stated in 1955 preservation of Green Belt was *'the very raison d'être of town and country planning'*.

e) Show how the Green Belt would meet the other objectives of the Framework.

The clear aim of a greater Exeter Green belt and that of a green belt surrounding the New Town of Cranbrook would be:-

- 1) To enhance and improve the natural beauty of the countryside adjoining the major centres of population.
- 2) To increase opportunities for the enjoyment of the countryside
- 3) To safeguard the surrounding countryside from future encroachment.

The exceptional circumstances, for example when planning for larger scale developments such as new settlements or major urban extensions. Accordingly, there is a strong view to designate this land as Green Belt as it would fit the criteria in relation to being a new settlement.

## **10.2 Green Wedge**

A succinct statement has been made, which sets out a compelling case for the green wedge between Cranbrook and Whimple. *'Residents do not wish to see any 'green wedges/spaces' sacrificed for building of any kind, as if it happens just once it would set a precedent and further unwelcome developments of housing areas would surely follow eventually, further degrading the qualities of the East Devon landscape.* Strategy 8 of the East Devon local plan, published in January 2016 only three years ago, was put in place specifically to prevent this from happening. This Strategy states that *'development will not be permitted within a Green Wedge if it could 'lead to or encourage settlement coalescence'*. Green Wedge status was allocated to land at the eastern end of Cranbrook and as such developing on any Green Wedge land sets a dangerous precedent for this vaguely protected category of land. And furthermore, any decision to contradict development on this type of land shows a failure to comply with s 24(1) Planning and Compulsory Purchase Act 2004, demonstrating that EDDC

appear willing to ignore the strategies accepted in the regional plan for the area where it is convenient to do so. A case in point is the attitude towards the Cobden triangle/ Green Wedge which undoubtedly puts other Green Wedge areas in East Devon which have been granted the same special status at risk. As there are only six Green Wedges in this part of the county, it is essential that these are protected from development pressures. Green Wedge status was allocated to this land for a reason. There are multiple benefits of Green Wedge: the protection of open countryside between towns, ensuring the physical separation and avoiding coalescence of towns, and the conservation and protection of landscape.

Green Wedge would undoubtedly increase the risk of future coalescence of Cranbrook with Whimble Village, and would result in harmful infringement on the rest of the Green Wedge which, after all, actually lies within Whimble Parish rather than Cranbrook (as I have stated already). The decision to contradict Strategy 8 of the East Devon Local Plan demonstrates a failure to comply with s 24(1) Planning and Compulsory Purchase Act 2004, which requires that the local plan is prepared in conformity with the regional strategy of the area.

### **10.3 SANGS (Suitable Alternative Natural Green Spaces)**

These areas are a vital element of the master plan. They not only provide recreation space but more significantly provide a buffer zone between surrounding villages, linked to the natural landscape. Key to this is the Villages of Rockbeare and Whimble. In addition some of these areas should remain in agricultural use. The importance of protecting these areas should be as robust as Green Belt legislation in the past. It should not be, should never be considered as potential development land. That is development being any changes in the use of the land, structures or changes to the landscape.

## **11. Infrastructure – Transport**

### **11.1 Motorised Vehicles**

First point to appreciate, according to Frank Schaffer, (1970) Secretary for the Commission of New Towns, wrote,

*“Traffic circulation is of particular importance. No master Plan can be drawn up without extensive study of the traffic flow the town will generate at various stages of growth and the road patterns must adequate for long-term future, for once the roads are put down there is little chance for second thoughts.”*

This is relevant today as it was 50 years ago. Local distribution roads are too narrow as are the interior estate roads. At present there is insufficient allocated spaces for cars, vans, motor homes for each dwelling. These issues give rise, in some cases to conflict, which hardly creates a convivial community. On street parking will be exacerbated as families grow up and join the car owning populace. The demographic profile will change over time, but there is likely to be a need for between 2.0 / 2.5 spaces for 3 bed accommodation and 1.5 / 2.00 for 2 bed accommodation. Although it is not the desire, it is reality and planning must take this into consideration.

The National Planning Policy states that *'street layouts should allow for the efficient delivery of goods, and access by service and emergency vehicles'*. The framework also states that *'opportunities to promote walking, cycling and public transport use are identified and pursued'*.

The width of the 'local distributor roads', being 6.2 meters is totally inadequate for the present traffic flows in the town. It is normal for queues to appear as two vehicles can't pass in safety when parking occurs on the public highway.

Due to the narrow internal estate roads there is a potential for an unacceptable impact on highway safety and risk to public safety and life, especially public service emergency vehicles and also removal and delivery services.

With the continued expansion of the town there is likely to be a severe and cumulative impact of extra vehicles on the road network, in and around Cranbrook New Town, eastwards and westward. Because of the lack of amenities in Cranbrook people at present are going to have to travel to either Exeter Honiton or Ottery St Mary, just to do their weekly shop - and, like the commuters who mainly have to travel to Exeter (or further afield) to work, this is likely to place an increasing strain on the road infrastructure of both Cranbrook itself and routes such as the B3174, the old London Road. Clearly this route is taking more and more vehicular traffic, especially at key junctions, including the Daisymount junction, Hand and Pen cross roads and Station Road leading to Broadclyst. Delays are often experienced when driving into the city of Exeter at Moor Lane Roundabout (near the Red Park & Ride interchange on the way into Exeter) and in the suburb of Heavitree). The growth of Cranbrook exacerbates these transport problems.

The NPF states that priority is for pedestrian and cycle movements, both within the scheme and with neighbouring areas. From the early stages there has been no designated cycle ways or plans to separate motorised vehicles from cycles and pedestrians.

Action must be taken sooner rather than later otherwise driving will be habitual even for very local journeys.

Little evidence that the design of estates enables charging of plug-in (electric and hybrid vehicles) in accessible and convenient locations.

The allocation of space is insufficient for the parking of vehicles, especially when the population expands and there is a peak in the late teenager / early twenties age group.

Demographic studies indicate one of the highest birth rates in the country. Four times the average. However, it does not look like that this has been built into current provision of services and amenities.

The proposed development looks set to close off the access from Cobden Lane onto the old A30 (London Road) and divert any traffic through the new development or back through the village of Whimple. This is neither necessary nor justified. It is an ancient route way, a public right of way and part of the heritage of Whimple. Whimple is accessed here via a single-track lane which is not suitable for large volumes of traffic, but it is used by local residents by farm vehicles that are unsuitable to travel through the middle of the village or through the centre of a high density housing estate, as has been suggested. The access from Cobden Lane onto London Road must stay as it is.

In a recent survey conducted by Forefront Market Research, 65% of respondents stated in respect of how you usually travel around – by car, motorcycle or van. In the same survey in answer to, ‘Which of the following organisations do you have most faith in delivering your priorities’ - only 13% stated, developers.

## **11.2 Cycling**

A key element in National Planning Policy is to promoting sustainable transport, provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans)

No thought has been given to cycle ways in the early planning. Critically, they must be linked to the needs of the community not as an afterthought. Cycle ways should be distinct paths, free from motorised traffic, stretching across the town to stations, Town Centre, neighbourhood centre and employment zones, schools and with links to Exeter / Honiton and beyond. It is not acceptable in a new 21st Century town to mix cycle routs with main routes / local distributor roads. In respect to London Road there should be a separate cycle way from the main road, perhaps with using existing hedging or new planting and should be a hard surface. In addition, there should also be no cycling on pavements, as this presents a risk to personal safety, especially cars coming into or out of the numerous residential side-roads. A further lack of ‘green planning’ is the fact that there are no dedicated cycle ways to the Skypark and the Science Park, plus three Warehouse facilities including Lidl’s regional distribution

centre, Amazon and DPD, to the west of Cranbrook. Although it is possible to cycle under the link tunnel from Cranbrook to the Airport – no official route is indicated.

There is some pavement along the "old A30" / London Road but this is inadequate for cycling and pedestrians. It should be integral in the development of all phases of Cranbrook to have dedicated cycle ways, free of motorised vehicles. These roadways link to stations place of work, Town Centre and key amenities in the town. It is known that there has been a large number of near-misses between cyclists and motorists at both of the zebra crossings in the Science Park where cyclists (and pedestrians) are meant to have priority.

It is worth noting that especially at weekends, the main "old A30" has for years been a favoured route for recreational cyclists, but all the new developments from the Rockbeare Straight westwards are making this road less attractive for such users.



Pound Lane, Crawley' West Sussex (If you could do it in the 50's you can do it today)

Cranbrook Town Council have stated that *"Cycle routes form a real opportunity for sustainable transport but these are slow to be delivered"* in the summary of representations made to the March/April 2019 regarding the Cranbrook Master Plan.

### **11.3 Walking**

There are serious health and safety issues when the expectation is that both cyclists and pedestrians are using the same walkways. There are not dedicated cycle ways built into the infrastructure of this new town. Ironically, there were miles of cycle ways built in the new town of Crawley, Sussex in 1950's, but it was established by a Development Corporation, not by a developer led consortium.

The ribbon nature of Cranbrook means that some facilities are a considerable distance from where people might live or work. Accordingly, many people will choose other methods, including cars to travel from one part of the town to another. The length of the New Town is four kilometres, measured on the old A30.

Cranbrook station in the far north-west corner of the town should have been better sited so as to be within convenient walking distance of a greater number of homes, reducing the desire for car journeys. The theory, as specified in the Development Plan Document is for basic services and facilities to be within around 400m walking distance. With the current lack of facilities and services plus infrastructure, this is just not happening.

#### **11.4 Electric Vehicles**

Provision should be made for all houses/flats completions to have the capability for re-charging electric / hybrid vehicles. This is likely to affect the design of estates and parking provision. Development must be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations. This should be part of achieving a Zero Carbon New Town. The NPPF states that '*New development should be planned for in ways that - can help to reduce greenhouse gas emissions*'. Little evidence supports this strategy in Cranbrook, except the new pub which has only two Charging Points.

#### **11.5 Trains**

Considerable delays in the opening of Cranbrook Railway Station have been experienced, however this station is now a considerable distance from the eastern expansion of Cranbrook.

This is not a high quality public transport infrastructure. The plan for an eastern station is credible, but it does ask the question why the Town Centre does not have a station, linked also to the secondary school.

It could be argued that doubling the entire line from Salisbury to Exeter Central would enhance the capacity on the national rail infrastructure. It is especially necessary from Pinhoe to Honiton /Axminster. Funding must be made available for this, without delay encountered over the last few years. And this should be set in the Cranbrook Master Plan and any land should be acquired for this purpose. At present one train per hour reduces demand as a potential commuter route and getting people out of cars.



Cranbrook Station, Devon (N.B Single Track)

The Devon Metro proposals for enhanced rail services in the Exeter area include aspirations for additional local services between Axminster and Exeter. This is being progressed as a local scheme by Devon County Council. This would require a second passing loop between Honiton and Exeter. Funding must be made available for this, without delay. The saga has been running for years with no apparent action. The rail system should allow at least one train every half-hour to run in each direction. South Western Railway made promises in a report in 2017 but significant improvements have not materialised.

There may be a need to provide a link rail to Exeter Airport to enhance the Regions Airports capacity and reduces car use to the Airport. It was planned to have a siding for good trains into the warehouse distribution complex, but this has not materialised.

### **11.6 Bus**

According to the Midweek Herald (8th May 2019) 'Throughout the day on Monday to Saturday, buses from Cranbrook to Exeter will leave every 20 minutes, with extra services at peak times'. Although late this is welcomed. However, a sizable part of the route within Cranbrook is an un-adopted highway, with poor road surface conditions. The frequency of buses makes it less attractive for those wanting to use them it to get to work and worsening congestion in Exeter which means that even in the middle of the day, and at weekends Sundays, one is prone to get delayed when driving into the city.

Furthermore, Cranbrook council has acknowledged that both, *'train and bus services are unreliable and infrequent with substantial gaps in the later evening which impacts on social activity and contributes to greater use of the car, which is convenient and flexible'*.

## 12. Infrastructure - Other forms

### 12.1 Electronic Communication

It is essential that Cranbrook is 'wired up' to support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connectivity. Masts and physical infrastructure should not be too obtrusive, critically, masts are becoming taller and more obtrusive with the introduction of 5G – Planning policies should restrict high levels.

### 12.2 Power Lines

The master plan indicates that the powerline tracking across the Cobdens urban village should be underground for 1K. In view of the vast increase in size of Cranbrook spreading across the London Road divide, there is no need to spend a considerable sum in creating an underground route. The pathway of the existing power line provides a green corridor through the urban area, which could be provided, but in a different location. It is also not clear who would pay for the underground routing of the power lines and what impact on health would there be for Power lines immediately below residential areas. It would be unlikely that the developers would pay for the realignment of the power cables, as it would have an adverse effect on their balance sheet. According to BTS consultants of Worcestershire, dated 5th October 2018 the cost as estimated by Weston Power Distribution.

Option	Voltage	Underground	Cost
One	132kV	1887 meters	£5,028,000
Two	132kV	1795 meters	£4,808,000

It is not clear whether this would be borne by electricity users or the government, or would the developers fund the project. Clearly as it is for the benefit of developers, the developers need to fund the costly project. it is a derogation of public duty to allow this underground power line to be constructed out of the public purse or electricity consumers.

### 12.3 Energy (including heat);

The new town has a District Heating Network providing heat and hot water. In Cranbrooks Case, the company E.ON is responsible for the design and operation of the heat distribution network and energy centre, including heat interface units that will

pipe heat into the individual homes and commercial premises. Although one would expect savings to the consumer, the total cost of heating a home and the associated carbon consumption will be comparable to a new home built to minimum standards and heated by gas.

#### **12.4 Community Infrastructure Levy (CIL)**

The Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008, as a tool for local authorities in England and Wales to help deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010. According to East Devon District Council in February 2019 that *“the new town’s infrastructure would be delivered through Section 106 legal agreements, which tailor the delivery of infrastructure to the development and will ultimately maximise the services and facilities that can be delivered from planning consents at the town”*.

There is little evidence that money is cascading down into the development of infrastructure in the New Town, including the Town Centre, which does not exist. The money seems to be ‘locked’ in an unknown location when it should be used to pump prime the Town Centre. We are not aware why this has not happened.

It is of great interest that a sum of £40 million of public money has been spent on getting Cranbrook off the ground. A further £50m of Government cash has been ploughed into East of Exeter ‘growth point’ including the Science Park / Skypark’ / link roads.

The Clyst Honiton bypass, with its 100m tunnel, has reportedly consumed around £20m of public money, with £12m being paid back by developer contributions. It is totally reasonable to suggest that this tunnel should have been part of the interchange on a ‘Trunk Road’ which lay the cost down to the Department of Transport, which would have freed up £12m for the enhancement of Cranbrook, the improved well-being of its citizens, much needed sports facilities and a thriving Town Centre, plus other substantial infrastructure legacy projects now, not in some vague time in the future.

### **13. Community facilities**

Planning policies should aim to achieve healthy, inclusive and safe places which promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy

pedestrian and cycle connections within and between neighbourhoods and at neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods.

Also the need for accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling. In addition, sports venues, open space, cultural buildings, meeting rooms, public houses and places of worship and other local services to enhance the sustainability of communities and residential environments. Without these key amenities facilities the town will not develop as a healthy, self-sustaining community.

### **13.1 Sport and recreation**

The National Planning Policy states the need to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:-

*‘Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments’.*

There is a significant lack of community facilities (The only Pub ‘acts as all things’; a local pub/restaurant, meeting venue, club venue, nursery) there is one café, three fast food venues, in a Town of over 6000 inhabitants. No community theatre or cinema or Town Hall as a focal venue for civic activities. No football, tennis or cricket facility, except within the confines of the secondary school and the good will of the Whimble Cricket Club. The original Cranbrook Plan which indicated a Cricket Pitch, which created a village green, has disappeared on the latest submission, due to pressure from developers, as like as not.

It is important to guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the communities ability to meet its day to day needs.

Loss of parking adjacent to heritage buildings / farmstead has already had a potential detrimental effect on the community of Cranbrook despite early promises.

This should be considered as an integral part of the Development Plan of a new community and should have been instigated a lot earlier in the planning of Cranbrook. We need to learn from our past history of new towns in the provision of sports and

recreational facilities. This has been a failure of the consortium and East Devon District Council. Apart from some provision in the two schools there are no sports facilities in the town, except the indoor area at Younghayes. And this is after nearly eight years from the first turf being dug. Football pitches are urgently needed. There is also a need for Club House facilities at the Sports site on London Road, not just a Porta cabin. It is reasonable for this to be paid for by the consortium through – ‘Planning Gain’. A one room changing facility offered by one of the house building companies is an insult. Do they expect men and women to share?

### **13.2 Open Spaces and Parks**

*The desire in Town Planning is “access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision”.*

However, there are very limited facilities so far, which is unacceptable bearing in mind when the first citizens moved in.

*In addition, “Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails”.*

### **13.3 Amenities**

At present there is only one Public House, one café at Younghayes and an up market restaurant, Jack on the Green and three take away establishments, plus mobile chippy. There should be more facilities as the developments move east, west and southwards, including additional pubs and restaurants, shops, post offices, possible hotels and health centres, office accommodation, meeting rooms. These provide important ‘hubs’ and create a feeling of belonging to distinct parts of the new town including the urban village of Treasbeare, Bluehayes, Cobdens and Grange, thus creating urban villages with the new town.

## **14. Heritage**

### **14.1 Sense of place**

*“Buildings, towns, monuments and other historic sites give us a sense of place. They remind us of our past, of how our forebears lived, and how our culture and society developed. They tell us what earlier generations aspired to and achieved”.* White Paper, This common Inheritance (1990)

This quotation is a significant starting point when highlighting issues of historic buildings within Cranbrook. There are a number of listed buildings within the boundary of Cranbrook, including Tillhouse Farm. This Grade 2 ‘listed’ building has remained in a derelict state, since a suspicious fire a number of years ago, and it still is in an even worse derelict state, including a roof sagging in one of the farm outbuildings (first stage of collapsing). This is a tragedy as this could provide a valuable resource to the new town and preserve a vital part of the built history of Cranbrook. It is also disappointing that land adjacent to Tillhouse Farm was built on rather than provide a Car Park for potential users of a community facility, which was planned to have small start-up business use. These historic spaces have been limited by allowing more houses built on land allocated for parking linked to Heritage infrastructure in another location. This is a classic example of exceptionally poor planning practices. This act of what could be considered ‘heritage vandalism’ by a national house builder is perhaps a deliberate attempt to demolish the building and not consider the potential for community use. The issue is not a question of blame, but to instigate the immediate reconstruction and conservation of this group of buildings. The National Policy Framework clearly states, *“the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation”.*

In the Master plan for Cranbrook it states: *“there are potential opportunities to re-purpose agricultural buildings for cultural active and as visitor interpretation centres”.*

There are a number of other historic buildings that also need to be protected as Cranbrook spreads eastwards, especially on the London Road.

### **14.2 Boundaries**

It is appreciated, for pragmatic reasons that the original parish of Whimble stretched further to the west to the nursery business on London Road and including, Lower Cobden farm, Middle Cobden Farm and north of Gibbets Lane. However the agreed new alignment for the Parish of Whimble is the ‘root of hedge’ to the west side of

Cobden Lane an important historic route way and an ideal boundary. Clearly, this would make all fields to the east, up to Church Road, Whimple, 'open countryside'.

### **14.3 Archaeology**

The national planning policy framework states that, '*local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:*

- a) assess the significance of heritage assets and the contribution they make to their environment; and*
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future'.*

Clearly, this is designed to protect historic assets. In Whimple, Rockbeare and Cranbrook the Roman Road that runs through this area has potential archaeological evidence that has not as yet been discovered. As far as we are aware, no strategy for dealing with the probability of sites of archaeological interest and associated protection of these site is included in the Cranbrook Master Plan. The key question is to whether archaeological surveys HAVE been carried out before development has taken place and WILL it be carried out in the future?

## **15. Culture**

### **15.1 Cultural Development Strategy**

The cultural vision for Cranbrook is outlined in the Cultural Development Strategy with the desire to:

- create a unique, desirable place to be
- celebrate local identity and embrace global opportunity
- support cultural innovation and make a sustainable future for all.

This Cultural Development Strategy therefore aims to set out the evidence for placing culture at the heart of development in Cranbrook, looking at wider evidence for culture from planning policy, aligning culture with other strategies and plans for Cranbrook such as the emerging Cranbrook Development Master Plan, getting a sense of the existing heritage of Cranbrook and its cultural demographics. Based on this

evidence and consultation with local and regional stakeholders, the Cultural Development Strategy goes on to suggest a development model and outline project framework in order to realise the cultural potential of Cranbrook, based around the four core themes of People, Learning and Skills, Activity and Infrastructure. The potential within the New Town is significant, but it is not helped by EDDC and its associates of the consortium. There is a chronic lack of infrastructure, no Town Centre, limited sports facilities and spaces for cultural activities. Cranbrook did have a local Development Officer that made a big impact on establishing groups, facilitating a cultural identity within the Town, but his position was, in effect, terminated by the Town Councillors although the majority of the funds were available by EDDC.

## **15. 2 Positive and negative impacts**

In the first few years Cranbrook has achieved a positive reputation for its cultural impact with a significant number of groups being formed in the new town. This includes the Pumpkin Parade (acknowledged by East Devon District Council as an important cultural event) and the Cranbrook Day and Fun Run for the charity. These were organised by the voluntary sector, despite the lack of facilities developed so far. Critically, facilities are needed including meeting rooms and conference facilities, as well as town centre arts facilities, museum, including a 400 seat theatre / cinema (A destination entertainment hub).

Cultural spaces have been limited by allowing more houses built on land allocated for parking linked to Heritage infrastructure in three cases. It could be argued this is a dereliction of development control practices by allowing development that has jeopardised the long term sustainable community use for this important heritage site.

National Planning Policy highlights, *'to guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the communities ability to meet its day to day needs'*. Loss of these heritage buildings / farmstead has already had a potential detrimental effect on the community of Cranbrook despite early promises. Ideas which did not come to fruition were small business units, an education centre, plus desperately needed meeting rooms and IT facilities – this was a costed proposal.

## **16. Garden City Standards**

According to the Royal Town Planning Institute, *"Participation in cultural and sporting activities enhances people's personal enjoyment, development, and fulfilment and improves their physical and mental health and wellbeing. And high-quality cultural and sports facilities help to make places more attractive, help to boost economic activity*

*and prosperity, and aid the development of shared identities and increased understanding between different communities.” (18th August 2016)* This would be linked to creating new Communities as part of its Garden City Standards for the 21st Century programme. This is designed to support any type of large-scale development on the basis that: According to the consultants view *“Many people worry that any new places built will be no more than soulless, unattractive dormitory suburbs... The nation cannot afford to build places that fail – and we should aspire to create great places, for everyone.”* This is key to new stages of the town.

The emphasis within the Garden City principles on high-quality environments for everyone backed by a fair development model is highly relevant to addressing today’s housing needs. The Town and Country Planning Association recognise the need to take action highlighted in a number of reports. Meeting housing needs is a principal concern, Garden Cities / Towns are holistically planned settlements that also offer ways of dealing with other challenges – climate change, innovation in design, local food production, and more all set within a context of participative governance.

## **17. Education**

The key issue is that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities

It is clear that with the high birth rate there not only needs to be adequate primary schools but also secondary schools 11 – 18 years age group. This is not evident from the Masterplan. As a community resource, it should be only reasonable for the Education campus to function seven days a week including for adult lifelong learning and utilising sports and recreation facilities. The secondary school is working in partnership with the Ted Wragg Multi-Academy Trust, although this ‘privatisation’ of education is seen by many as having a negative social and educational outcomes. According to an internal source the school has 45% of pupils requiring Special needs Education – the national average is 16%. This signals a deeper concern in this new and developing town

Facilities will also be needed for lifelong learning activities and club premises for the young, where learning can take place. According to Shaffer, F. (1970) *“the high percentage of children in the new towns made it particularly important to consider the formation of youth clubs”*. This is as relevant today as it was in the 1970’s, perhaps more so. Apart from ‘uniformed’ youth groups there is a lack of provision for Youth Clubs.

Clearly, eastern expansion of Cranbrook, there needs to be new schools constructed at the same time as new residential construction takes place. Whimble School is now at full capacity.

## **18. Health and wellbeing**

National Policy framework states that, *'access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities'*.

Also is the need to *'create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles'*.

New towns need to enable and support healthy lifestyles, especially where this would address identified local health and well-being needs , for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

The situation after seven years there is a lack of sports facilities, no allotments, small gardens and lack of Town Centre and as the development moves east, lack of shops in eastern end of Cranbrook.

Cranbrook is designated as under the 'healthy new town programme' in 2017/18. Following direction from NHS England, the programme will concentrate on developing a new care model. Clearly this is not working, apart from basic medical needs; it's difficult to achieve these desires in the new town of Cranbrook because of the lack of sports and other health related facilities. Many of the citizens travel outside of Cranbrook for their sporting activities, which is not within the ethos of creating a sustainable New Town.

Already indicated in this report is the unsatisfactory mix of cycling, walking and vehicles.

One fundamental issue is the early curtailment of the contract between the Health Supplier for the Cranbrook Medical Practice and the CCG (Clinical Commissioning Group) for NHS Devon. This is due to end on the 31<sup>st</sup> March 2020. No alternative is in place at present to run the Health Centre. It could suggest a failed model for the provision of such an essential service to the people of Cranbrook, especially a town with a birth rate four time higher than average.

## **19. Employment**

Cranbrook is intended to be home for some 20,000 people. Although Cranbrook is supposed to have considerable public funding for the established of employment, there is no tangible input to provide employment for its population. It is not correct that the New Town is going to be a centre for jobs and that the working population will find employment within this Growth Point.

The main employers in Exeter are the Met Office, the Royal Devon and Exeter Hospital and Exeter University / Exeter College all of which require commuting from Cranbrook. The local employment areas, including the Science Park has got off to a very slow start and the Skypark has only just started to get off the ground. The new Lidl warehouse was set to employ up to 500 workers according to the Retail Gazette (November 10th 2017), although the majority will be low paid. Amazon is set to employ some additional 30 staff, plus additional drivers as they relocate to Clyst Honiton – part of the gig economy. Clearly there are far fewer jobs than anticipated by East Devon District Council. As yet there are few SME's (Small to medium sized enterprises) with Cranbrook and, as far as we are aware, no business units except outside Cranbrook. In addition, there are limited numbers of retail opportunities, largely because there is no Town Centre. Once again this highlights the lack of planning in the early 'history' of Cranbrook and lack of due diligence of the EDDC.

If Cranbrook is to become a successful and vibrant Town, it will need to create its own opportunities. The employment policy is to concentrate on three numbered themes

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

Unlike most historic New Towns which had a major employer, like Livingstone in Scotland (Roots Cars), Washington, County Durham (Nissan Cars ), Skelmersdale, Lancashire (Co-operative Bank, and Matalan's headquarters). There is no large scale employer like these in the Cranbrook area. For Cranbrook to become successful there I needs to be strong employment within the Town. There is very little at present. At present there is only talk. A scheme for Start-up business was refused by EDDC, because the land allocated for parking was built on. Other schemes include a cluster of shipping containers in the Town Centre Area. This sets an extremely poor image for the town and for EDDC – cheap end of the market solution. Again this is not in line with the vision of the Cranbrook founding fathers.

According to Devon Live July 2018 stated, *'At the end of last year, Exeter was ranked the second fastest growing city in the UK in terms of employment at 1.2%'*. However, it does not appear to enhance the opportunities for Cranbrook.

Other ideas are that new community partners are keen to back the ideas of a *'business ladder'* and develop an enterprise Town. Clearly, there is a need for a public funded injection to create local employment. Another vain hope is the Cranbrook Partnership but no capital will be available to assist in their task.

It has been claimed a significant public sector funding and investments including forward funding of infrastructure, has helped the private sector to commence developments. However, these are purely residential developments. Critically, the employment requirements for developing a new community have failed, e.g. The Sky Park and Exeter Science Park including the Lidl Distribution Centre have only just got off the ground.

It is worth citing that in the early 50's Harlow, Basildon and Stevenage created masterplans which had integrated into the design criteria, industrial parks and office locations plus housing estates to suit the needs of the new town's population.

In employment terms the growth sector is within the construction sector i.e. building residential accommodation not commercial premises for employment. However, according to 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 also in decline due to lack of economic growth, Brexit pessimism and uncertainty.

There are bold predictions for new jobs in Cranbrook, but new jobs require premises, offices, workshops, retailers and entrepreneurs. There is little evidence to support this employment growth strategy and a reduced level of consumer demand for goods and services.

It is now worth retuning to the NPF, which states that, *Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future'*

The Cranbrook Plan - 2013-2031 has very little to say about building an infrastructure for employment, which is chronically disturbing. The whole point about plan a New Town is to ensure it is a sustainable community with employment opportunities within the new town.

## **20. Environmental Impact**

### **20.1 Climate Change and Zero carbon**

The New Town should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of

communities and infrastructure to climate change impacts. This should include in developments, efficient insulation, solar energy, ground heat pump if possible.

There has been only limited tree planting in Cranbrook, this significantly falls short of what might be reasonable. Milton Keynes has a million trees planted for a population of 250,000. Pro rata Cranbrook is well below this desired figure to mitigate carbon release.

Improved public transport would also be a valuable tool, especially electric vehicles. In addition the provision of charging points for all new homes.

Some developments are in a potential flood risk setting; however, it is important that the local planning authorities should ensure that flood risk is not increased elsewhere – downstream. It is a reasonable view to disallow any planning application for housing within flood plains.

Both in the original phase and now in the proposed next phases there has been no provision for the reduction and/or offsetting of carbon emissions and greenhouse gases. Developers have objected to requests from East Devon District Council to provide solar panels as being too expensive.

There is an opportunity for SANGs areas to include tree planting / woodland creation, as part of CO2 offsetting.

Critically, Cranbrook is a long way short of delivering a truly zero carbon new town. This report highlights inadequate public transport, lack of local employment, including retail jobs. The development of the Science Park and Skypark has only had a limited uptake. Travelling to and from work is a fundamental necessity for most residents of the New Town. Travel to work hardly ever follows route of public transport. We live in the days of a labyrinth of commuter journeys.

Looking back, when the developments at Cranbrook were first being designed, there was the intention to make it a 'ground-breaking low-carbon community', and a model for future urban developments to follow.

Once again aspirations have not translated into reality. This is mainly because most of the facilities that were envisaged for what was meant to become a self-sufficient town have not yet been delivered - most notably the Town Centre, places to work and leisure activities. Because these facilities are not in place, there is a high dependence on private cars. Although there are new employment sites being developed not far from Cranbrook, e.g. Skypark, Logistics Centre West and East, and the Science Park, few people appear to want to walk or cycle there; and in reality most people actually commute to Exeter or beyond.

Houses were supposed to be built in a way that reduces energy usage, such as ensuring plenty of insulation to reduce the need for heating, but in practice House

Builders, like Taylor Wimpey, Bovis and Persimmon have constructed properties as cheaply as possible. Quality concerns are illustrated in the lengthy 'snagging lists' when purchasers take occupation and there is a complete reluctance to spend money conforming to these 'green' credentials. Homes which are more energy-efficient and carbon-neutral. Fitting solar panels to new houses would be a possible step in the right direction.

The fact that there is little infrastructure, employment and retail outlets and no Town Centre has exacerbated the car ownership necessity. Residents already living in Cranbrook have almost unanimously got into the 'car culture' and this attitude will be difficult to shift if other transport options do eventually get the priority they need. Although it was desired to be a 'low-carbon', pedestrian and cycle-friendly sentiments, necessity has prevailed.

The Government's "UK Low Carbon Transition Plan" has as one of its five main aims,

*"to build a low-carbon UK: by playing our part in reducing global emissions, Britain needs to become a low carbon country". Furthermore, "Across business, we can build up the skills to be more resource-efficient. Saving carbon can become part of how business is done: every financial officer knowing their savings and liabilities from carbon, every builder having the skills to build in a way which saves energy. There will be costs to the transition. But they are far outweighed by the costs if we didn't act and faced the expense of adapting and coping with dangerous climate change".*

Eleven years after these words were written, it appears that not much has changed. Cranbrook should have been a model for energy efficiency and new technology in house design, but another dormitory town for Exeter /suburb for Exeter, devoid of community facilities and high density housing and automotive congestion.

## **20.2 Flood Plains**

According to the Environment Agency, over 3 million people are at risk of surface water flooding in England. Many homes have in the past been built on Flood Plains exacerbating the problem. The South West Regional Flood Risk Appraisal indicates that the River Clyst have large floodplains whilst the new Cranbrook community lies on the fringe and in some parts in the floodplain. It is a concern of residents in Cranbrook, especially as the development moves east and surface water run from urbanisation could realistically cause problems.

The Environment Agency flood maps currently show large areas at high risk of flooding across the proposed development location, especially around the 'Cranny Brook', but this modelling only shows the effects of flooding in the current conditions. It does not show how the proposed development will impact the extent of flooding, but given the high risk and high velocity of flood water currently shown, it looks highly likely that this will increase and flooding will be more extensive across these areas in the light of climate change.

Some developments are in a potential flood risk zone, however, it is important that the local planning authorities should ensure that flood risk is not increased elsewhere – downstream. It is a reasonable view to disallow any planning application for housing within flood plains.

The NPPF clearly states, paragraph 155, *the need to avoid development in areas at risk of flooding; any such development that is deemed necessary must not lead to an increased risk of flooding elsewhere*. Planning policies should take account of guidance from the Environment Agency and other relevant flood risk management authorities Ref. NPPF paragraph 156.

Section 14 of the National Planning Policy Framework states the need to support the transition to a low-carbon future in a changing climate, taking full account of flood risk. Cranbrook is within an area of potential flooding. Development exacerbates the problems of flooding – (i) less ability for rainwater to drain away naturally (ii) increased incidence of "heavy rain" episodes as the climate changes. Ref. River Don, Yorkshire and Lincolnshire, November 2019.

There is a need to protect existing biodiversity and landscapes. It means that the very existence of the Cobdens area should be put in doubt as the loss in green space between Cranbrook and Whimble will mean increased flooding and decreased biodiversity, at the same time as altering local landscapes irreversibly.

### **20.3 Heritage Assets**

The NPF states that *'Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats'*.

The EDDC has a very poor record on the preservation and enhancement of historic building in Cranbrook. There are examples of developers (Persimmon Homes) leaving listed buildings to decay, but no apparent action by the local authority. The NPF clearly states that,

*‘Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision’*

So what is happening at the 15<sup>th</sup> Century, Tillhouse Farm?, Land put aside for parking has now been built on, so this limits the historic building use for community or commercial / business start-ups. Clearly, this should not happen in future and that historic and listed building should be preserved in its environmental context. It is shameful and deplorable that Cranbrook Council have stated in their submission that, *‘restoration of the farm complex and bringing it back to its original heritage as a public asset appears undeliverable’*. It is legally the responsibility of Persimmon Homes to reinstate this fine listed building and they have the ability to give this to the community for public good - EDDC should be held to account. In another case, complete historic farmsteads to the west of Cranbrook have been completely demolished. Not the best form of conservation!



Tillhouse Farm, Cranbrook, Devon – Before and after suspicious fire

In addition, the old London Road, which were a former ‘coach and four’ route in the 18th and 19th century and motorised coaches in the 20th Century. More significantly it was the main roman road from Exeter to Dorchester and onto London. Have adequate archaeological surveys been carried out before development has taken place?

## **20.4 Natural habitats**

Section 15 of the National Planning Policy Framework, *‘Conserving and Enhancing the Natural Environment,’* clearly outlines the need for *‘planning policies and decisions to contribute to and enhance the natural and local environment’* by a number of methods, including: Protecting and enhancing valued landscapes. Recognising the intrinsic character and beauty of the countryside and to minimising impacts on

biodiversity. The extensive expansion of Cranbrook hardly complies with the intent of the NPPF. Development will have a negative impact on the wildlife present, resulting in the destruction of wildlife rather than the desired aim of wildlife promotion.

More specifically, the stunning landscapes of East Devon support a diverse range of wildlife habitats and species and sites of national and international wildlife importance. The development is responsible for a potential loss of natural environment flora and fauna, including two types of owls. In any new development existing trees need to be protected, potentially by 'blanket' Tree Preservation Orders (TPO) but also by 'growing more trees'.

An element of some sensitivity in planning is evident as seen by mature trees which have been able to be retained (unable to trace information on mature trees that have actually been lost). However, as far as I am aware the proposed Grange development there are at least 16 mature oak trees under threat, in what is currently the Grange parkland to the south of the London Road. Trees are vital for absorbing carbon dioxide and have great aesthetic appeal, recreational value and preserve part of natural environment and wildlife habitat.



Orchard in Whimple, East Devon

## **20.5 Agricultural assessments**

Department for Environment, Food and Rural Affairs Agricultural Land Classification mapping that the site is Grade 3a agricultural land. The National Planning Policy Framework confirms that "*land in grades 1, 2 and 3a is deemed Best and Most Versatile Agricultural Land (BMV)*". There is a presumption against development on BMV land in the Framework which in the interests of sustainable development should be safeguarded for future agricultural use. Furthermore, the NPPF states that planning

policies and decisions should contribute to and enhance the natural and local environment by *“recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services, including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”*.

## **20.6 Airport Safeguarding**

Noise reduction is an important environmental and public health issues and in view of the new urban villages of Cranbrook it is only reasonable that the developers pay the full cost rather than subsidised from the public purse.

## **20.7 Light pollution**

Every effort should take place, including the involvement of appropriate bodies, to militate against light pollution experienced within the town and its neighbouring villages. This includes sport centre floodlights and urban street lighting, cycle ways and pedestrian route lights.

## **20.8 Impact on Whimble**

Initial promises / assurances were given at the outset that the New Town would not interfere with the way of life in the outlying villages. Whimble is a special village with a history of apple orchards and cider production. It has a school with 150 children in attendance and it has residents who vigorously care for the unique nature of the village and each other's welfare.

Many people live and visit Devon as being a beautiful County with green fields and an abundance of flora and fauna sitting alongside well-kept villages. In addition the area has rich fertile agricultural land which is being built on. Although not an 'area of outstanding natural beauty', it still has value to East Devon and the people that live here. It may also be, within or on the fringe of a potential, new Jurassic Coast National Park.

The significant population would have a detrimental effect on Whimble, especially pollution impact of vehicle, noise and light pollution from the new town. In addition, as has already been stated, increased pressure on local public sector services such as healthcare, quality of schooling and refuse collection.

Increased road usage increases not only pollution but risk to pedestrians in the area and current infrastructure within the village of Whimble itself not suitable for increased traffic.

A fundamental issue to comments raised in the submission to the consultation was the fields to the east of Cobdens Lane and north of London Road. This is a triangular shaped area of land and is held with high regard as it formed part of the Whimble Parish. It is the view of the vast majority of the people of Whimble that this should be considered as, 'open countryside' or designated as 'Green Belt'. It will be within the curtilage of the Whimble Neighbourhood Plan if current thinking on this matter prevails. It would be fundamentally damaging to the ethos of subsidiarity, to go against the will of local people. However the most significant detrimental feature of the 'new' Cranbrook Plan is the expansion east, which was not indicated in the consultation process, is the large development of houses to the east of Cobden lane, plus the Travellers and Gypsy. This massive expansion in the east of Cranbrook as laid out in the Cranbrook Development Plan Document directly contradicts section 15 in the National Planning Framework. It is also worthy of note that the proposed other site for a Travellers and Gypsy site in the Cranbrook Master 2017/8 has been removed without apparent explanation. This site in the Bluehayes area was within Broadclyst Parish. None of the two sites were within Cranbrook Town.

## **20.9 Visual impact on Whimble**

In terms of visual impact and relating to Policy Framework (Conserving and enhancing the natural environment), Strategy 7 of the East Devon Local Plan rules against development that would cause the *'adverse disruption of a view from a public place which forms part of the distinctive character of the area or otherwise causes significant visual intrusions'*. Development east of Cobden Lane and in some cases east of Middle Cobden farm and land to the north of the lane would have a significant visual impact on the landscape impacting on residents of significant numbers of properties not only in Whimble but the hamlet of Hand and Pen. Not only views of houses, Gypsy and Traveller and the general urbanisation of this tract of landscape. Once again, this failure to comply with Strategy 7 of the East Devon Local Plan is contradictory of the requirement under section 24(1) Planning and Compulsory Purchase Act 2004.

## **21. Greater Exeter Strategic Plan**

This new concept forms a plan for the future of the area. The local authorities of East Devon, Exeter, Mid Devon and Teignbridge and Devon County Council are currently working together, engaging with stakeholders and communities, to prepare a Greater

Exeter Strategic Plan. This formal statutory document will provide the overall spatial strategy and level of housing and employment land to be provided up to 2040.

The plan will be delivered by working together for best possible outcomes for the provision of new homes, jobs and infrastructure for existing and future generations, while also protecting and enhancing the environment.

Therefore, the aim of the new concept is working together across various local authority boundaries in seeking to develop a plan which responds to how people live in the area. The purpose of preparing the Greater Exeter Strategic Plan is to:

- Have a joined-up vision and aspirations for the area
- Meet the area's housing needs in the right locations



- Secure economic growth and increased prosperity
- Provide transport and infrastructure improvements needed to support sustainable growth
- Conserve and enhance the area's environment

A key analysis of the results of a survey said the most stated view on additional housing was that, *"nothing would make me support new housing"*, scored most highly.

The Greater Exeter Strategic Plan will be a new formal statutory document, providing the overall spatial strategy and level of housing and employment land to be provided in the period to 2040. When adopted, it will sit above Local Plans for each area which will continue to be prepared to consider local level issues. Neighbourhood Plans will also be promoted so communities can continue to be empowered to make the detailed

planning decisions for the benefit of their area. Hopefully, this will include development of Brown Field sites. It will certainly focus on "*Low Carbon and Climate Change Evidence Base report*" conducted by Exeter University dated March 2018.

Another critical factor is the impact in East Devon of Culm Garden Village, which was awarded 'Garden Village Status' by the Government in January 2017. Located 12 miles north of Cranbrook and east of Cullompton, the Garden Village has the potential to deliver up to 5,000 sustainable new homes in a country park landscape, with jobs, community facilities and transport, all integrated with Cullompton itself – that's the theory. We shall watch with interest.

We shall also be watching the possibility of the creation of the Jurassic coast National Park, affecting East Devon and Dorset.

Accordingly, the master plan for Cranbrook and any future Neighbourhood plan for Whimble will be built on the needs, wishes, desires and aspirations of the people of Cranbrook and its surrounding communities in a framework of the wider strategic zone and wishes of its people.

## **21. Part Two, Clyst Valley Regional Park**

Legislation was established in 1981 for the creation of Regional Parks for recreation in England and Wales. The key definition being:-

(1) A regional park is a park set in the countryside and extensive in size, located so as to be convenient to serve the recreational needs of a substantial number of the inhabitants of the area.

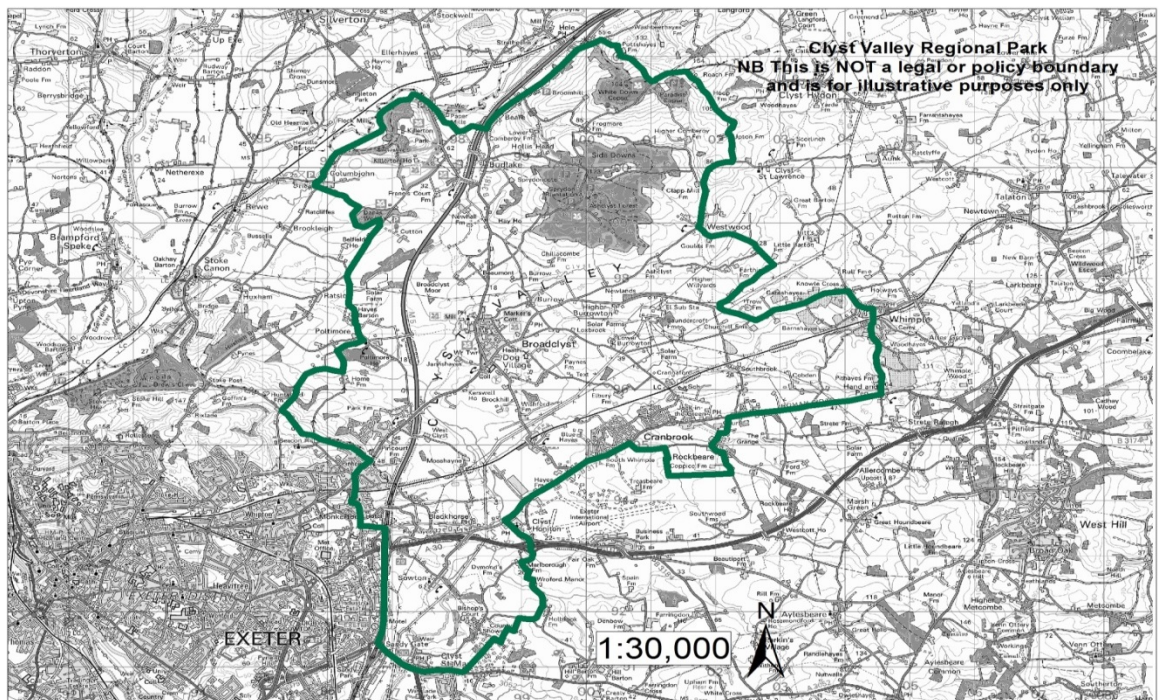
(2) County Councils shall have power—

(a) By order to designate lands within their region as regional parks, and

(b) To manage as a single administrative unit any parts of any such park which are under the control of the council.

The park is defined under law, as an intermediate area, not quite with the status of a national park but with considerable significance, for the lower parts of England and Wales. One of the most publicised was the Lee Valley Regional Park in London adopted in 2010.

In East Devon a masterplan for the Clyst Valley Regional Park is currently being prepared by East Devon County Council, although few residents are aware of this significant concept.



Outline of Clyst Valley Regional Park

According to Exeter and East Devon Growth Point Partnership, *the Clyst Valley Regional Park will be the new green lung between Exeter, Cranbrook and Exeter Science Park. East Devon District Council has stated that, they 'believe that with a growing population, it's important that communities can connect with nature for their health and wellbeing. Equally, it's important that the things that make the valley special are protected and restored; tranquillity, wildlife, historic trees and orchards'.*

The Clyst ("Clear Water") Valley is in the midst of a rapidly growing population east of Exeter, including the new town of Cranbrook.

Whilst some parts of it are well known, for example the National Trust's Kilmington House & Park, others parts are inaccessible. In preparation for the park, nine partners have joined forces to help people to explore record and restore the heritage of trees in the Clyst Valley. They will help to define an ambitious 25 year vision for the fledgling Clyst Valley Regional Park.

The concept is to provide high quality natural green space;

- Ensure natural systems function optimally;

- Ensure residents, commuters, school children and visitors of all abilities have easy access to high quality open spaces via a network of cycling and walking trails, and thereby benefit health, education and local food production;
- Take recreation pressure away from European protected wildlife sites;
- Link into the open spaces of neighbouring local authorities;
- Enhance biodiversity e.g. ponds, orchards, trees;
- Conserve and enhance heritage assets and their setting to enrich the cultural identity of the area.

Essential it is a country park spread over a number of sites covering the Clyst Valley river catchment area, on the eastern fringes of Exeter. It encompasses historic parklands, farms and separates West Clyst settlement on the eastern margins of Exeter and the urban development of Cranbrook.

Section 1.6 of the Cranbrook Master Plan states, *“new town needs, to deliver: schools, shops, parks, open spaces, roads and services to meet the resident and visitor needs for a brand new 21<sup>st</sup> Century town”*. I am not aware of any indication that there are any specific reference in the ‘Cranbrook Plan submission Draft’ to the Regional Park, which incorporates much of the New Town.

As previously stated one of the five key remits of the Greater Exeter Strategic Plan is conserve and enhances the area’s environment. This should include a limitation on the outward ‘sprawl’ of the urban areas of Exeter, particularly, south west and east. By creating a Green Belt in conjunction with establishing a Regional Park with open access to as much as possible should be a preferred option.

Elements of the National Policy Framework, including: Part 8 - ‘Promoting healthy and safe communities’, Part 14 - ‘Meeting the challenge of climate change, flooding and coastal change’ and Part 15 - ‘Conserving and enhancing the natural environment’ plus Part 16 - ‘Conserving and enhancing the historic environment’ all have relevant to this new Regional Park.

However, it does not mitigate the serious flaws and non-alignment of the Cranbrook development to the requirements of the NPF. Therefore, the Regional Park must be challenged as to it being a protected special environmental area or an attempt to shroud the impact of the urban sprawl of Exeter, which is predominantly flood plans and should not be built on in any circumstances.

## 22. Summary

In accordance with the requirements of the creation of a new master plan, the citizen of Cranbrook and its surroundings have sent a strong message of a shared vision for their area. Chris Patten (1989) became an advocate for localism; he stated; *'many of the important choices are decisions which should be made locally, to reflect the values which local communities place on their surroundings'*.

The challenge is to steer the development of the new town into a lively, exiting and harmonious place to live, with homes, jobs, culture, sports & recreation and amenities that fulfil the people of Cranbrook, now and as the town grows. A town which is designed for living, with high quality architecture with green values and attempting to be a zero carbon town, with realistic aims and positive environmental considerations. We feel if the town was developed by a Development Corporation as in the past, rather than the failed system of 'Developer Led' new town the aspiration would have been met earlier.

When profits come before people, you have what you have got, but not what you should have.

For various reasons stated in this report, the concept of 'developer led' New Town creation is flawed, nothing happens without effective planning. This is now being looked at, at Government level. A critical need is for a coherent plan, not a series of mundane, mediocre, middling estates bolted together with limited infrastructure, especially retail, sports, social and cultural. It is not happening because it is a developer led the process, not created by professional Town Planners. It is worth noting that according to Peter Hall, former lecturer University College London and author, *"Planners should make recommendations, but it should not seek to impose prescriptions"*. The key question remains, what lesson has history taught us in the creation of new communities / new towns? The answer is plenty if one looks for them.

As stated Cranbrook New Town does not align itself to the National Planning Policies 2012/18. This needs to be resolved by undertaking a legal review and an independent and impartial appraisal before any more planning permission is granted.

The latest plan, which is significantly different from the 'Preferred Approach Master Plan' 2017/8 that the changes have not been subject to public consultation. The impact on Whimple has now significantly changed, in what could be considered in a spurious manner. Plans are still being modified with latest revision dated 5<sup>th</sup> November 2019.

As Frank Shaffer (1970) put it; *"We must have the same vision, the same determination, and the same social understanding that inspired the new towns of the past and we must tackle the same devotion to the more difficult tasks ahead"*

This statutory process can now shape, direct and help to deliver a sustainable development, by influencing local planning decisions as part of the statutory development plan. For the people of Cranbrook and the surrounding villages, including Whimble and Rockbeare. It is acknowledged of the need for homes, but there is a good way, an environmental way with high design standards, open spaces, amenities, local employment, outstanding public transport and an appropriate infrastructure and services to support the new town. There is also a bad way, which is what Cranbrook appears to be moving towards and being allowed to develop in this way by EDDC and its councillors.

We must therefore build for the future. We must build a green and pleasant Town where people desire to be, can put down roots and join the vision of the New Town as a great place to live, work and relax. Build a town, which does have a decent and effective infrastructure, planned for the future needs. That any schemes protects surrounding villages from development and that life can remain distinct and be separate sustainable communities, in accordance with the principles of good Town and Country Planning and the will of its 'local' people. This places 'localism' at the heart of developing neighbourhood and master plans.

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\*Course profile approved by RTPI. (Royal Town Planning Institute)

References have been made to a variety of documents: including statutory obligations, developments plans, EDDC Reports and academic sources, plus comments from members of the Protect our Whimble and Rockbeare Group.

Dated 10<sup>th</sup> November 2019