

Agenda for Strategic Planning Committee Wednesday, 20th February, 2019, 10.00 am

Members of Strategic Planning Committee

Councillors: P Diviani (Chairman), M Allen (Vice-Chairman),
S Bond, M Booth, C Brown, J Elson, G Godbeer, I Hall, M Howe,
G Jung, R Longhurst, G Pook, E Rylance, P Skinner and
M Williamson

Venue: Council Chamber Blackdown House

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(or group number 01395 517546)

Monday, 11 February 2019



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1 Public speaking

Information on [public speaking](#) is available online

2 Minutes of the previous meeting (Pages 3 - 9)

3 Apologies

4 Declarations of interest

Guidance is available online to Councillors and co-opted members on making [declarations of interest](#)

5 Matters of urgency

Information on [matters of urgency](#) is available online

6 Confidential/exempt item(s)

To agree any items to be dealt with after the public (including the Press) have been excluded. There are no items which officers recommend should be dealt with in this way.

7 Cranbrook Plan Development Plan Document (Pages 10 - 144)

8 Community Infrastructure Levy Preliminary Draft Charging Schedule (Pages 145 - 245)

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[Decision making and equalities](#)

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EAST DEVON DISTRICT COUNCIL**Minutes of the meeting of Strategic Planning Committee held at Council Chamber, Knowle, Sidmouth on 29 January 2019****Attendance list at end of document**

The meeting started at 10.04 am and ended at 2.15 pm

35 Public speaking

A number of members of the public commented on item 38, as follows:

Richard Mead, speaking as a resident of Axminster asked the committee to provide evidence for the need of 850+ houses, evidence that would show that East Devon residents could afford to purchase the houses, that residents had been consulted about the types of houses, bungalows or apartments that would be needed and to show that Axminster wanted and needed another retail centre. Confirmation was sought that the proposed relief road and other surfaces would be completed before starting the proposed development. Mr Mead referred to the need for bungalows for the disabled and houses for families with gardens, and went on to ask for a referendum on the proposal.

Alistair Ferguson, speaking as a resident of Axminster on focused on two main concerns. His first concern was about the 2016 Local Plan and how the land area proposed to be developed had almost doubled in size. He questioned the credibility of Persimmon Homes on the pretext that more houses were required to fund the relief road and that Persimmon Homes would be benefiting from £10m of taxpayers money. He went on to say that the people of Axminster felt they had not had any meaningful say in the size of the development. The second concern he raised was about the environmental impact of the development and the relief road and referred to David Attenborough's concerns about the environmental crisis to the ecosystems. Mr Ferguson felt that East Devon was building houses on a scale that was not required for local needs and would not be supported by the local community. He said the relief road by design would generate high levels of pollution and noise pollution which would impact upon the houses built, wildlife habitats, potentially causing trees and hedgerows to be destroyed and be exacerbating the risk of flooding.

Cllr Alistair Forbes, Chairman of All Saints Parish Council, outlined to the committee that members of the parish council and residents of the village were against the Axminster Master Plan because it would make the village unsustainable. He questioned the Central Government Funds to subsidise 850 unwanted houses. He addressed there had been no local press coverage, no meetings and no concern for Axminster residents. Cllr Forbes requested a written response to his questions. He said that issues relating to the bridge and the by-pass needed to be addressed.

Paul Hayward, speaking as a member of the public made reference to the councillor Code of Conduct and predetermination. He believed it was a rushed plan that had been designed for commercial gain and not in the interests of Axminster residents and other neighbouring parishes. He said it was merely to achieve housing targets. Mr Hayward raised concerns about the lack of consultation for the relief road and said the road would increase air pollution to the new estate. He asked the committee to consider a deferral of the masterplan so that land to the north east of Axminster could be assessed as the site was believed to be a medieval deer park and was of archaeological interest.

Barry James, from Persimmon Homes, advised the development of the masterplan had been a robust process which had included two sets of public consultations. He advised Permission Homes were content with the plan as it was presented today subject to late revision to the phasing and providing a range of dwelling numbers rather than prescribing specific numbers. He referred to the southern parcel and up to 95 units and advised that applications had been submitted including the much needed relief road.

Conrad Libischer, speaking as a member of the public, endorsed what the first four speakers had said but questioned the robustness of the process and made reference to the topography of the site and the increase to the 850 homes required to fund the relief road. He addressed a number of issues including traffic and the increase in more homes would result in more cars which would generate additional traffic into Axminster; the distances to local amenities and schools Mr Libischer said it was doubtful that people would be encouraged to walk or use public transport. The second issue addressed was about Weycroft Bridge and the A35 junction and it was highlighted it was dangerous road. Mr Libischer addressed the Chairman and urged him to reject the extension of houses in the Master Plan.

Brian Watson from Axminster Town Council outlined to the committee that the majority of town council members did approve the 650 houses but had issues with the masterplan. He referred to page 46 and 47 of the agenda and raised concerns that the entire length of the road should be in place first before the houses. He raised concerns about the road itself and said it would need to be integrated into the current roads and no recognition of three footpaths 5, 19 and 73 that go within that site. Mr Watson queried about how the sector lane junction was going to be treated and raised concerns that people from Hawkchurch would need to use that junction to come into Axminster. He commented that a town centre weight restriction would need to be enforced. Brian Watson queried the housing mix and referred to the need for bungalows and apartments and the requirement of parking close to properties to encourage electric cars and said there was no evidence of car parking facilities within the development.

Elizabeth Pole from Honiton & Axe Vale Branch Labour Party queried the housing needs for residents and said more social housing was needed. She questioned the employment space and the infrastructure to support the town. Ms Pole outlined to the committee that data showed there was a 40% of growth in East Devon and questioned why East Devon District Council was only delivering 12% - 14% of housing and said this was barely half of its own targets. She also referred to executive housing and not meeting the needs of its local residents and highlighted that social housing is self-evidently the cheapest option and underprovided by the district council.

Brian Henstock, speaking as a resident of Axminster agreed a relief road was needed but raised concerns about the inclusion of Weycroft Bridge and suggested that the relief road should follow the railway line which would take off the road before Weycroft Bridge.

Jeremy Walden from Axminster Town Council outlined to the committee that the relief road should be delivered first before any of the houses were built. He also referred to the town centre and said it should be closed off to heavy goods vehicles except for delivery. Other issues include the parameters of the design of the masterplan do not seem to mesh with the existing road.

The minutes of the Strategic Planning Committee meeting held on 27 November 2018 were confirmed and signed as a true record with the following amendment to page 4 in item 25 which should read an uplift to 953 homes per 'year' for East Devon in 2018.

37 **Declarations of interest**

Councillor Paul Diviani – minute 38 – Personal interest – Chairman of Axminster Regeneration Board, Chairman of Blackdown Hills Area of Outstanding Natural Beauty and Barry James, Persimmon Homes, former Local Government employee from Somerset District Council

Councillor Graham Godbeer – minute 38 – Personal Interest – local resident and Member of East Devon Area of Outstanding Natural Beauty

Councillor Geoff Pook – minute 38 – Personal interest – involved in the construction industry and Member of East Devon Area of Outstanding Natural Beauty

Councillor Ian Hall – minute 38 – Personal interest – Devon County Councillor, Ward Member for Axminster, Member of Axminster Regeneration Board, East Devon District Council Youth Champion and Member of Cloakham Lawns

Councillor Andrew Moulding – minute 38 – Personal interest – Member of Axminster Regeneration Board

38 **Axminster Masterplan**

The Service Lead, Planning Strategy and Development Management presented the report, which sought Member endorsement of a masterplan for the development of an eastern urban extension to the town of Axminster, incorporating the delivery of a relief road. The masterplan had been produced by a team of consultants, who were commissioned by the council in partnership with Persimmon Homes and The Crown Estate, who were the main land owners/developers with interests in the site. The masterplan had been the subject of consultation and engagement with the community.

Points raised during discussion of the Axminster Masterplan included:

- The danger of setting a precedent.
- The primary reason for the expansion of the site was to fund the delivery of the relief road.
- The need for community facilities and open space provision.
- The need to have a mix of homes to deliver to all ages and requirements of the community.
- Inaccuracies in the masterplan were highlighted.
- Expansion of the existing school would help drive up student numbers such that a sixth form college could become viable.
- Concerns about losing the five year land supply.
- The need for an assessment of the site to consider the potential archaeological interest of a medieval deer park.
- Distances between the site and Axminster town centre.
- Viability work on the relief road.

RESOLVED:

1. that the resolution of Cabinet on 31st October 2018 to agree in principle the borrowing of the shortfall in funding for the relief road, on the basis that this would be repaid through developer contributions subject to a detailed proposal being agreed by Council, and how this resolution has informed the masterplan and would enable the early delivery of the relief road, be noted and

2. that the Axminster North Eastern Urban Extension Masterplan for the purposes of informing decision making on future planning applications for the urban extension area, and to support the Council's bid for monies under the Housing Infrastructure Fund, be agreed subject to amending the housing numbers on the Persimmon parcels on page 75 of the agenda and delegated authority to address typos, wording and formatting before final publication

39 **East Devon Local List of Non-designated Heritage Assets**

This report recommended agreement to a draft East Devon Local List Guide for public consultation. The draft guide set out criteria for assessing whether locally important heritage assets should be placed on the East Devon 'Local List'.

The Chairman and the committee were in support of the public consultation being undertaken on the draft Local List Guide and noted the assessment process would be undertaken by the community groups to gather the information and to submit their nomination to EDDC.

RESOLVED:

That public consultation would be undertaken on the appended draft Local List Guide, to advise local communities on the identification and assessment of non-designated heritage assets for inclusion on a Local List, be agreed.

40 **Employment Land Review to year ending 31 March 2018**

The report produced by the Planning Policy team provided summary details of the Employment Land Review for 2017-18.

Specific comment on the Employment Land Review covered:

- That it was important not to lose focus of employment across the whole of the district, and about the impact of existing communities.

RESOLVED:

That the report be noted.

41 **Review of East Devon Area of Special Control of Advertisements (ASCA)**

This report sought Members agreement to commence consultation on changes to the areas included in the East Devon Area of Special Control of Advertisements. The Service Lead Strategic, Planning and Development Management outlined the proposed boundary generally follows that of the Built-up Area Boundary defined in the Local Plan.

Discussion covered:

- Some concerns were expressed about the proposed exclusion of most of Cranbrook from the restriction. In response the committee were advised Cranbrook was seen as a vibrant town with commercial viabilities.
- Clarification was sought on Lypstone. In response the committee were advised the works programme would be reviewed.
- Clarification was sought on the legal process if a ward member did not agree with an officer recommendation. In response the committee were advised in this

instance a discussion with the Strategic Lead for Governance and Licensing would be required.

RESOLVED:

that consultation be undertaken on the proposed changes to the area covered by the Area of Special Control of Advertisements be agreed

42 **Government response to consultation on developer contributions reform: technical consultation**

The Government were seeking views on draft legislation to amend the Community Infrastructure Levy Regulations 2010 (as amended) to obtain the right level of developer contributions for the provision of infrastructure and assets within the District. The report provided an overview of this technical consultation on the reform of development contributions, and set out proposed responses to the consultation questions.

Members discussed concerns over:

- Clarification was sought about starter homes being exempt from paying CIL where the dwelling is sold to individuals whose household annual income was no more than £80,000. Concerns were raised about low incomes in Devon.
- Clarification was sought about the process of CIL contributions.
- Clarification was sought about Cranbrook and CIL contributions and the delivery of infrastructure. In response the Service Lead Strategic, Planning and Development Management, advised an additional Strategic Planning Committee had been arranged on 20 February to discuss the Cranbrook Plan and the CIL Charing Schedule.

RESOLVED:

That submission of the proposed response to the Government consultation on Development contributions reform: technical consultation, be agreed.

43 **New Local Plan Timetable**

The Service Lead Strategic, Planning and Development Management's report set out a first draft of a timetable for production of a new Local Plan for East Devon. It did so on an assumption that the Greater Exeter Strategic Plan (GESP) would be produced to publicised timetables. Updated timetables would be brought to future Strategic Planning Committee meetings.

National planning policy framework encouraged local authorities to work together and join up their thinking. GESP covered the local planning authority areas of:

- East Devon District Council
- Exeter City Council
- Mid Devon District Council
- Teignbridge District Council

Devon County Council were a key partner in GESP production with a particular interest and responsibility in infrastructure and transport matters.

GESP would cover a number of strategic planning issues across the four planning authorities. The intention was that it would set out housing development numbers through to 2040, and potentially beyond, along with policy for employment land and more general policies promoting major facilities and supporting infrastructure. It was also planned to identify and allocate strategic/large scale sites for future development. The new local plan would provide policy to implement the strategy set out in the GESP. The GESP and the local plan were designed to work together, with GESP superseding the most strategic section of the local plan.

The timetable established that production of the new local plan should follow on after key stages of work on GESP production. GESP work could then inform local plan work and content. This meant that there was likely to be a period of up to 18 months between when GESP was adopted (likely to be around April 2022) and when a new local plan was adopted (likely to be late summer/autumn 2023). The villages plan would be encompassed into the local plan. It would not be expected that the villages plan would change, but it would need to go through the local plan consultation.

Some concern was expressed policies should be developed quicker than as indicated in the draft timetable, as it was felt that many of the existing policies were inadequate in their current form. Policies were constantly evolving in terms of legislation. Creating master plans represented a more proactive approach, with the hope that they would lead to improved developments.

Concern was also expressed that neighbourhood plans and the villages' plan being superseded went against localism, as control was being taken away from communities and given to higher levels of authority. If GESP was based on national planning policy it may become contrary to local planning guidance and policy. The Service Lead – Strategic Planning and Development Management reported that he did not envisage neighbourhood plans being superseded by GESP. GESP was about co-operatively working together in partnership rather than control being taken away.

RESOLVED:

that the draft new local plan timetable, noting alignment with timelines for production of the Greater Exeter Strategic Plan, be agreed.

Attendance List

Councillors present:

P Diviani (Chairman)
S Bond
C Brown (Vice-Chairman)
J Elson
G Godbeer
I Hall
M Howe
G Jung
R Longhurst
G Pook
E Rylance
P Skinner

Councillors also present (for some or all the meeting)

D Barratt
P Faithfull
C Gardner
A Moulding
M Rixson
I Thomas

Officers in attendance:

Ed Freeman, Service Lead Strategic Planning and Development Management
Wendy Harris, Democratic Services Officer
Alethea Thompson, Democratic Services Officer

Councillor apologies:

M Allen
M Williamson

Chairman

Date:



Report to: **Strategic Planning Committee**

Date of Meeting: 20 February 2019

Public Document: Yes

Exemption: None

Review date for release None

Agenda item: 6

Subject: **Cranbrook Plan Development Plan Document**

Purpose of report: The report relates to the publication of the proposed submission version of the Cranbrook Plan Development Plan Document.

Recommendation: **That Members:**

1. **Approve the Cranbrook Plan Development Plan Document for consultation as detailed in this report and in accordance with the adopted Statement of Community Involvement.**
2. **Recommend the Cranbrook Plan Development Plan Document to Full Council for submission to the Planning Inspectorate for Examination in Public.**
3. **Note the position in terms of the current planning applications for the expansion of the town.**
4. **Grant delegated powers to the Service Lead – Planning Strategy and Development Management to make minor changes and address any typo's and other errors to the document prior to consultation.**

Reason for recommendation: To allow the production of a Development Plan Document to guide the expansion of Cranbrook to around 8,000 homes to be progressed.

Officer: Ed Freeman - Service Lead Planning Strategy and Development Management, 01395 517519

Financial implications: The financial implications detailed in this report are complex particularly around the viability assessment and links to the CIL review. External consultants have been engaged to examine the costs of delivery and the most appropriate means of funding these costs, the conclusions and implications are detailed in the report.

Legal implications: As a development plan document the Cranbrook Plan will sit alongside the East Devon Local Plan and will form part of the development plan for East Devon. At this stage there are no legal implications other than as set out in the report.

Equalities impact: High Impact

The Development Plan document will need to ensure that the needs of all groups and sections of society are considered and catered for, including Gypsies and Travellers.

Risk: Medium Risk

The expansion of Cranbrook to circa 7850 homes represents the single largest contribution to meeting the strategic housing requirement in the

District. It is vital that this comes forward on a comprehensive basis. The Cranbrook Development Plan document is identified in the Local Plan as being critical to securing the long term success of Cranbrook.

Links to background information:

- Cranbrook Plan Preferred Approach documentation
<http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-preferred-approach-consultation-201718/#article-content>
- Issues and Options report
<http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/issues-and-options-consultation/#article-content>
- Cranbrook Plan evidence base
<http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-evidence-base/#article-content>
- Rockbeare Neighbourhood Plan
<http://eastdevon.gov.uk/media/2653631/Rockbeare-Neighbourhood-Plan-Referendum-Version-July18.pdf>

Link to Council Plan: Encouraging communities to be outstanding, developing an outstanding local economy, delivering and promoting our outstanding environment.

1 Background

Outline planning permission for the first 2,900 homes at Cranbrook was issued in October 2010 followed shortly by the reserved matters for the first 1100 homes in April 2011. Development commenced in June 2011 and progress since then has been rapid. Particular milestones have included:

- The first households moving in during July 2012
- The opening of the first primary school (St Martin's) in September 2012
- The start of the bus service in May 2013
- Elections to the newly formed Cranbrook Town Council in May 2015
- The opening of the new education campus (including the second primary school and first secondary school) and the first shop in September 2015
- The commencement of rail services from Cranbrook station in December 2015
- The opening of the Cranberry Farm pub in the town centre in May 2017

Today there are approximately 1,900 households living at Cranbrook, equivalent to a population of around 4,400 people. The town has been given Healthy New Town status (one of only ten such developments in England) as part of an NHS England programme and alongside Exeter has been selected as one of 12 demonstrator sites for a Sport England Local Delivery Pilot aimed at tackling inactivity. These demonstrate that Cranbrook has a national profile.

2 Local Plan

The Local Plan 2013-2031 anticipates Cranbrook comprising approximately 7,850 new homes by 2031. This equates to a population of around 18,500 people meaning that Cranbrook will have quickly expanded to become the second largest town in the District. Accommodating a further 4,270 homes at Cranbrook over and above what currently has the benefit of planning permission represents the single largest contribution to meeting the strategic housing requirement in the District.

2 Cranbrook Plan to date

In November 2014 the Council committed to a masterplanning exercise, known as the Cranbrook Plan, to review progress with the new town, refresh the vision and guide the expansion to 7,850 homes. Specifically this would address the 1,550 homes that are not currently allocated through Strategy 12 and will be the primary document that is turned to and used in determining future planning applications at Cranbrook. The Cranbrook Plan will form part of the suite of documents making up the Development Plan for East Devon.

In June and July 2016 an issues and options public consultation was held in relation to the Cranbrook Plan. The consultation responses highlighted that minimising impact upon surrounding communities, noise on proposed residents and returning the London Road to being a focus for commercial development are all important factors to the public. The two favoured development scenarios both involved some development south of the London Road (B3174), including development to the north east of Rockbeare.

In November 2017, Strategic Planning Committee approved an 8 week period of consultation on a preferred approach document for the Cranbrook Plan, which took forward the favoured development scenarios and produced a draft masterplan for development to show these. This consultation ran from 10 November 2017 to 8 January 2018 and although was not a statutory requirement, consultation at such a stage is considered good practice.

The preferred approach consultation documentation comprised the masterplan for Cranbrook, which set out the evidence behind the preferred approach as well as plans identifying land for differing types of development, and a separate list of policy requirements. In addition, the Sustainability Appraisal and Strategic Environmental Assessment reports to accompany the plan were also consulted upon. The evidence base behind the plan was available for public viewing during the consultation period.

A total of 138 consultation responses were received during the consultation period. Of these, 6 were from Town and Parish Councils, 2 from County Councils (Devon and Somerset), 2 from District Councillors, 16 from other groups and consultation bodies, 12 from developers or agents and the remaining 100 from members of the public. The majority of the representations from members of the public were from residents of Cranbrook and the surrounding settlements of Broadclyst Station, Rockbeare and Whimple.

5. Cranbrook Plan Publication document

Officers have now finalised production of a proposed publication version of the Cranbrook Plan Development Plan Document. This has been produced taking into account the feedback received during the previous Preferred Approach consultation in late 2017/early 2018 and that received from the meetings of Strategic Planning Committee on 20 March 2018 and 27 November 2018. In addition, Officers have had a dialogue with members regarding the production of the plan as well as officers from Devon County Council and members of Cranbrook Town Council in order to refine and evidence the Plan. Furthermore, other interested stakeholders such as interested land owners, agents and developers, the Cranbrook Healthy New Towns Executive and NEW Devon CCG have all been consulted on specific matters in order to ensure that the plan is based upon the most up-to-date evidence as possible. Discussion of headline matters of interest is given in the following paragraphs.

National Planning Policy Framework (NPPF)

Since the closing of the Preferred Approach consultation, in July 2018 the Government published the updated National Planning Policy Framework (NPPF). For the purposes of plan making, transitional provisions embedded in the July 2018 publication have come to an end and The Cranbrook Plan DPD must be in compliance with the new document; Officers are confident of this

being the case and the plan now presented has been developed following the policy direction set out in the NPPF.

Housing numbers

The Cranbrook Plan DPD now presented allocates land for a total of 4,170 dwellings plus 15 permanent gypsy and traveller pitches. In respect of the dwelling allocations this is expressed in each expansion area as an approximate figure and therefore could result in a minor number of dwellings above or below these figures being achieved. Across the four expansion areas the accommodation is split as follows:

Bluehayes expansion area: 960 dwellings

Treabeare expansion area: 915 dwellings, 5 gypsy and traveller pitches

Cobdens expansion area: 1495 dwellings, 10 gypsy and traveller pitches

Grange expansion area: 800 dwellings

Development at Cranbrook has already consented a total of 3,580 dwellings which gives a resultant figure of 7,750 dwellings in the expanded town. This is 100 dwellings short of the target figure of 7,850 dwellings set out in Strategy 12 Development at Cranbrook of the adopted East Devon Local Plan 2013-2031.

However, additional dwellings are expected to be delivered in Cranbrook Town Centre beyond those allocated in the four expansion areas and already consented as part of the original outline planning permission for the town (which apportions approximately 200 dwellings to the town centre). The addition of these properties will take housing delivery at Cranbrook to at least those set out in Strategy 12.

Health and Wellbeing

The built environment is being increasingly recognised as having an impact upon people's health and wellbeing. With the NHS recently announcing in their 10 year plan that the aim is to look to preventative measures for ill health rather than reactive measures to improve health outcomes, it is imperative that the planning system takes account of this. Over the last few years and particularly since Cranbrook became one of NHS England's 10 demonstrator sites for the Healthy New Town programme there has been increasing collaboration between the differing health bodies and the planning team at Cranbrook. This has led towards the production of the direction of strategy for health and wellbeing in the town.

The Plan puts the good health and wellbeing of residents of the town as a principal strategic policy (Policy CB1). This manifests itself throughout the Plan but in particular in terms of the delivery of infrastructure, including a health and wellbeing hub with satellite uses in neighbourhood centres, leisure centre and open space; through the promotion of activity and active travel on well designed and thought out routes; locating development so that it is within walking distance of local amenities and seeking new dwellings to meet the Nationally Described Space Standards.

Development in Green Wedge

At Preferred Approach stage of the DPD production it was proposed to include a limited amount of built development in the Green Wedge surrounding Rockbeare (Local Plan 2013-2031 Strategy 8 Development in Green Wedges) as part of both the Treasbeare and Grange expansion areas.

Since that time the Rockbeare Neighbourhood Plan has been made and now forms part of the East Devon Development Plan. The Plan includes policy Rock06 Green Wedge which builds upon Strategy 8 in the East Devon Local Plan 2013-2031 and states that development in the Green Wedge in the Rockbeare Neighbourhood Plan area will not be supported other than in limited cases (for agriculture, horticulture or forestry, to support the Clyst Valley Regional Park or where within existing curtilage and proportionate in scale and type). This policy is therefore more restrictive than the wording of Strategy 8.

At the meeting of SPC on 27 November 2018 members expressed concern at continuing to look to allocate land within this Green Wedge in the Grange expansion area in light of the now made Rockbeare Neighbourhood Plan and the conflict with policy Rock06. The Cranbrook Plan does not have to comply with the neighbourhood plan under the legislation but it is acknowledged that weight should be given to the neighbourhood plan and the principles of localism that underpin it.

Officers have reviewed this situation once again, considering alternative land availability and the impacts of allocating differing land parcels. As part of the Preferred Approach consultation in late 2017/early 2018, additional land to the east of the then identified Grange expansion area was put forward for development. Officers have also enquired of the intervening land owner who has confirmed the availability of their land for development.

These additional land parcels have been appraised in further detail, including with respect to archaeological and drainage considerations and are considered suitable for development. The inclusion of this land and the exclusion of that within the Rockbeare Green Wedge as shown in policy Rock06 results in the same overall quantum of housing within the Cranbrook Plan and extends the town no further east than was previously indicated, having regard to the extent of the Cobdens expansion area to the north of London Road (B3174).

It must be noted that the spatial impacts of the removal of the land previously indicated for development does result in a slightly longer stretch of single sided development on London Road in a relatively central location in the town and this has a potential impact upon the character of the town and the accessibility of services. Nevertheless, Officers consider that the inclusion of this alternative land is sound when the plan is taken as a whole.

Viability

Viability appraisal of the Cranbrook Plan has taken place by external consultants alongside the review of the East Devon CIL charging schedule, which is presented separately on this meeting agenda.

The viability assessment has robustly examined the full costs of implementing the development, based upon the layout shown in the Masterplan accompanying the Cranbrook Plan. A list of infrastructure required to be delivered at Cranbrook in order to ensure the creation of a happy, healthy and sustainable town has been produced and contribution amounts refined in light of further discussion with stakeholders and Members to prioritise monies.

As part of the tandem CIL review and following the announcement by the Government to change the CIL Regulations to lift the current pooling restrictions for S106 obligations, the proposal is to have a nil (£0) CIL charge for residential development at Cranbrook and instead to secure infrastructure funding and delivery through S106 agreements. The viability assessment for the Cranbrook Plan has been based on this mechanism.

The utilisation of S106 agreements in lieu of CIL payments at the town will ensure that development at Cranbrook delivers the necessary on and off-site infrastructure to support the expanding community and that this is done in a timely fashion. This timely delivery is of particular pertinence given the strategic scale of development at Cranbrook and the detrimental impacts that would arise if crucial facilities are not delivered or are delayed in delivery, given the relative infancy of the town and its currently available facilities and services.

In order to deliver a viable Plan, it is proposed that the affordable housing rate for Cranbrook is set at 15%. This is lower than the 25% currently applicable to the two already allocated expansion areas for the town and would be the lowest affordable housing rate in the District. However, the cost of infrastructure delivery is high and the viability exercise had demonstrated that the Plan would be unviable if a rate of 25% were sought.

In addition to 15% affordable housing, the Plan sets out that not less than 4% of housing delivery should be provided as plots for custom and self-build housing. Whilst not falling under the definition of affordable housing set out in the NPPF, such a route is traditionally more cost effective for occupiers than buying a home on the open market. The plan also seeks a wider range of housing types than have previously been provided at Cranbrook to better meet the needs of the community.

Town Centre and Neighbourhood Centres

Cranbrook Town Centre was granted planning permission as part of the original outline planning permission for the first 2900 homes back in October 2010. Since then only The Cranberry Farm pub has been constructed on the land and residential development of the town has now taken place both east and west of the Town Centre, leaving it as a void.

It is imperative that the Town Centre is developed in such a way that recognises the shift away from a traditional retail led centre and instead seeks to generate activity from a wider range of uses and those which encourage the growth of a community. The viability work in support of the plan helps to give clarity over the funding available from the development to support delivery and while other funding sources will still be needed the clarity provided will help work to progress on delivery of facilities in the town centre. Policy CB22 sets out the building blocks for this to occur and proposes that activity is focussed around a town square which would become a focus of activity. The Cranbrook Plan proposes to identify a formal Town Centre boundary which will allow for consideration of the impact of out-of-town proposals at Cranbrook and elsewhere (e.g. proposals on the eastern side of Exeter) upon it.

Policy CB23 of the Plan relates to the delivery of residential accommodation in both the Town Centre and the Neighbourhood Centres. This is encouraged overall as it is recognised that the presence of people living in these areas is needed to secure footfall and both day time and night time activity.

Research carried out as part of the NHS Healthy New Towns programme assessed the accessibility of routes through the Town Centre and has made suggestions over the best routes for sustaining footfall dependent uses in the long term. Crucially, this has identified the London Road (B3174) as being the best route due to its level of accessibility and connectivity with other places. As a result, the Cranbrook Plan includes a policy (CB24) which supports the principle of development of retail and footfall dependent uses along a stretch of the London Road running east from the existing junction of the London Road with the Town Centre. This is envisaged to act as a benefit to the main Town Centre, drawing people into it and will not detract from activities within.

Habitat Mitigation

Cranbrook is located within the 10km zone of influence of both the Pebblebed Heaths and the Exe Estuary and accordingly new development must ensure that it adequately mitigates for the impacts it would otherwise have on these European protected sites.

Crucially for development allocated at Cranbrook this involves the delivery of approximately 78 hectares of Suitable Alternative Natural Green Space (SANGS). The Plan identifies 100 hectares of land for this use in each of the four different expansion areas, providing scope for land to come forward in different areas to meet the needs of differing land owners and developments and allowing for any discounts which may be necessary in areas where for example, the land is at risk of flood. In addition the Plan and associated viability testing allows for financial contributions towards off-site mitigation measures in line with the South East Devon Mitigation Strategy.

The Plan also requires the production of Landscape, biodiversity and drainage strategies for the expansion areas. These documents will ensure that at a strategic level these matters are

considered and a strategy developed to minimise impacts and where possible lead to net gains in biodiversity and on-site surface water infiltration.

6 Next steps

Consultation

Following endorsement of the submission of the Cranbrook Plan to the Planning Inspectorate by both Strategic Planning Committee and Full Council there is a legal requirement for a consultation period of not less than 6 weeks. Any representations received during this period will be sent to the Planning Inspectorate for their assessment as part of the submission of the Plan; no action is taken by the Council on these representations.

It is proposed that this final round of consultation runs from Monday 11th March – Wednesday 23rd April inclusive. The additional days beyond the 6 week period are to allow for the Bank Holidays on Good Friday and Easter Monday. During this period of consultation, copies of the Plan submission documents will be made available on the East Devon District Council website, at the Council's offices in Honiton and Exmouth and at the Younghayes Centre in Cranbrook, which is in excess of our legal obligations and the level of consultation committed to for this stage of Plan production in the adopted Statement of Community Involvement.

The purdah pre-election period begins on Friday 22nd March, meaning that the majority of the consultation period will occur during purdah. This is acceptable and meets with the rules and guidance governing such a period.

It is proposed that an informative display of the Plan proposals will be on permanent display at the Younghayes Centre in Cranbrook during this period of consultation and that public exhibitions will be held in Cranbrook, Rockbeare and Clyst Honiton in order to give the public the chance to ask any questions. It is not proposed to hold an exhibition in Broadclyst during this time as properties directly affected by the proposals which are in Broadclyst Parish are closer to Cranbrook than the village of Broadclyst. During the Preferred Approach consultation an exhibition was held in Broadclyst Victory Hall (in the centre of the village) which attracted only one visitor during the 3hr event, despite other activities being held at the hall during that period. An offer for Officers to attend a meeting of Cranbrook Town Council, Rockbeare Parish Council, Clyst Honiton Parish Council, Broadclyst Parish Council and Whimble Parish Council in order to answer questions arising will be made.

Submission of the Cranbrook Plan DPD

Following this final period of consultation the Cranbrook Plan and associated documents and supporting evidence, including comments received during the consultation, will be submitted for examination. A government appointed Planning Inspector will assess the plan and come to final conclusions on whether it is sound and can be formally approved and adopted under plan making processes and regulations. The Inspector may recommend a number of changes to the plan and it may also be that further consultation, on these, is required. On final adoption by the Council the plan will, however, carry its full statutory weight in decision making processes.

The current Local Development Scheme (LDS) for East Devon, which sets out the work programme and timescales for plan production has out-of-date timescales for the production of the Cranbrook Plan as a result of delays unknown at the time the LDS was drafted. The timetable below is an up-to-date estimate of the dates of key events leading up to the adoption of the Cranbrook Plan.

March/April 2019 – Publication stage consultation

June 2019 – Submission to Planning Inspectorate

September 2019 – Inspector’s Hearings

March 2020 – Adoption of the Cranbrook Plan DPD

Applications

In 2014 an outline planning application was made by Cranbrook LVA Llp for up to 250 homes on land known as Farlands, north of London Road, but outside the allocated land for the expansion of the town. Discussions continue with the applicant in respect of this application and in particular regarding infrastructure requests to support the delivery of housing on this land, which the Preferred Approach consultation documentation identified for development.

In 2015 outline planning applications were submitted for the three expansion areas (Bluehayes, Cobdens and Treasbeare) in the control of members of the New Community Partners. Two of the three areas (bar Treasbeare) is allocated for development in the East Devon Local Plan 2013- 2031. Each of the applications contained insufficient information in support of the submitted Environmental Statements and were subject of Regulation 22 (now Regulation 25) notices under the Environmental Impact Assessment Regulations, seeking additional information. The information requested has never been submitted in respect of any of the three applications and they continue to be held in abeyance.

In 2017 a revised outline planning application was submitted by Hallam Land Management and Taylor Wimpey for the Treasbeare expansion land. The application sought to address a number of concerns previously raised in relation to the earlier 2015 application and to more closely align with the anticipated masterplan. Discussions on this specific application have not progressed in recent months although discussions more generally on masterplan issues have been the subject of regular meetings in order to resolve conflict and share knowledge and expertise in order to reach a positive outcome for all.

Each of these applications is divergent to a greater or lesser degree with the Cranbrook Plan DPD and so it is envisaged that these applications would need to go through a process of trying to align them with the DPD before we would be in a position to determine these applications. In the event that alignment with the DPD is achieved in advance of the examination of the plan the Members views on determining the application at that stage will be sought. There is pressure from the developers to grant consent for these applications to maintain delivery rates at Cranbrook or at least to gain a resolution to approve in order to progress drafting of Section 106 agreements and enable delivery post resolution of the new CIL Charging schedule. It is likely that an early resolution to grant would be more acceptable on the allocated east and west expansion areas where these proposals are in accordance with the local plan. The other expansion areas do not benefit from local plan allocations and so are more reliant on the adoption of the DPD for policy support.

Development Plan Document

The Cranbrook Plan

2013-2031



February 2019

Submission draft

East Devon – an outstanding place

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Foreword

The idea of creating a new community in East Devon can be traced back to the last century. Although initially the proposals proved controversial a milestone was reached in 2010 with the granting of outline planning permission for the first 2,900 homes and building started in June 2011.

The first residents moved in during the summer of 2012, benefitting from fibre optic broadband to the home, and a vision of a zero carbon development, with a flagship district heating network providing heat and hot water to the town; progress has continued to be rapid ever since. St. Martin's Primary School grew from fewer than 40 pupils in September 2012 to over 400 just 3 years later. Devon's newest 'all-through' school, Cranbrook Education Campus, opened in September 2015. Cranbrook's first neighbourhood shops and eagerly anticipated train station followed shortly thereafter and the Cranberry Farm pub opened in May 2017.

Key building blocks were put in place early to ensure Cranbrook's community was a close-knit affair. The work of the first Minister for Cranbrook, a dedicated community development worker and the availability of the Younghayes Community Centre were all important factors to help Cranbrook develop as a genuine community from the outset. With over 40 clubs and societies now active in Cranbrook and the Town Council meeting every fortnight there's no doubt that the town has taken the first important steps to fulfil its vision to become a vibrant and attractive place.

Around 4,000 people live in Cranbrook now and the results of the resident surveys indicate that over 90% of people have moved from within Devon – truly a case of providing homes for local people. The results also show that a strong community spirit exists.

Looking to the future, East Devon District Council's Local Plan anticipates that Cranbrook will grow to a population of around 20,000 people. It will become the second largest town in the district and one of the largest in Devon. This Cranbrook Plan guides this future growth, setting out how and where the homes, shops, business and community spaces to serve those people will go. It aims to remove uncertainty and barriers to delivery to enable the continued smooth delivery of the town; ensure that the delivery of community facilities and employment spaces are prioritised alongside the delivery of homes and provide clarity to all about how we will ensure that Cranbrook is a great place for all to live and work.

Cllr Ian Thomas

Leader of East Devon District Council

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Introduction

- 1.1 This Cranbrook Development Plan Document (hereafter referred to as the Cranbrook Plan) will guide the future development of Cranbrook into the 2030's.
- 1.2 Cranbrook has already seen rapid development, by the beginning of 2019 around 1,800 new homes had been built and occupied, together with the completion of two schools for more than 1400 pupils, a railway station and neighbourhood centre as well as an extensive Country Park. Planning permissions and land allocations already provide for the expansion of Cranbrook to around 6,500 homes and this plan allocates land to take development to around 7,750 homes for 18,000 or more residents. The Cranbrook Plan aims to assist and speed up the delivery of Cranbrook in a planned and commercially viable and profitable manner, whilst developing a town that is a healthy and attractive place to live and work in. The plan will ensure that through a managed process the services and facilities required by a new town are delivered in tandem with the new homes.
- 1.3 Between 2016 and 2019, Cranbrook has been one of ten NHS England Healthy New Towns demonstrator sites. The Healthy New Towns programme aims to help ensure that new developments embed the promotion of health and wellbeing in the built environment, in developing new models of care and through social interaction. The Cranbrook Plan places these objectives into planning policies, securing the legacy of the programme in the town.
- 1.4 In December 2017 and in partnership with Exeter, Cranbrook was selected as one of twelve Sport England Local Delivery Pilot demonstrator sites. The programme runs for four years and aims to tackle inactivity focussing on groups who are least likely to participate in at least 30 minutes of moderate exercise per week.
- 1.5 As well as providing much needed housing to meet the growing population, The Cranbrook Plan looks to embed within it the principles of designing good health and wellbeing outcomes into the town and encouraging people to lead active lifestyles.
- 1.6 The Cranbrook Plan also sets out policy to provide the supporting facilities that a sustainable new town needs; including reinvigorating a vision of a zero carbon development, together with the delivery of schools, shops, parks, open spaces, roads and services to meet the resident and visitor needs for a brand new 21st century town.

Cranbrook Plan area and overarching proposals

- 1.7 This Cranbrook Plan forms part of the overall development plan for East Devon and seeks to integrate with but expand upon the already adopted East Devon Local Plan (2013-2031) that covers the whole of the District. In so doing, the Cranbrook Plan adds considerable extra detail and allocates additional land to accommodate the planned growth which is identified within the Local Plan (2013-2031).
- 1.8 The Cranbrook Plan has been prepared against a background of the fact that parts of Cranbrook have already been built, and there are existing planning permissions that allow Cranbrook to expand from its current total of around 1800 homes to just over 3500 homes. The Cranbrook Plan adds further details and guidance that can support existing permissions but more importantly also sets out how and where further expansion of the town, beyond the current permissions, should occur.
- 1.9 The Cranbrook Plan also includes policies for the Town Centre of Cranbrook and indicates where applications/changes to what is already permitted or existing may be positively encouraged and supported to assist delivery of a healthy and sustainable new town.
- 1.10 The policies contained within the plan have been prepared against a number of key plan objectives to ensure that there has been a focus to the work which has been undertaken. The overall topic headings, formal plan objectives, together with some supporting commentary are all set out in the table on the following pages:

Subject	Plan Objectives	Issues and Summary Commentary
Health and Wellbeing	<ol style="list-style-type: none"> 1. Health and wellbeing is designed and integrated into all parts of the town to reduce the development of long-term health conditions 2. A balanced active community which embraces active travel and enjoys the best health and wellbeing outcomes in the UK 3. The best outdoor environment for everyone, including the young and vulnerable 4. From the start new technology helps health and wellbeing services work together to provide 	<p>Good health and wellbeing will be the lead indicator of success in Cranbrook and policies and proposals in this plan are geared around delivery of these outcomes. In 2016 Cranbrook was selected by NHS England as one of ten Healthy New Town demonstrator sites¹. Selection provides opportunities to trial ways of building-in improved health and wellbeing outcomes through the design of the built environment, new ways of providing care, and action within the community.</p> <p>As a new town Cranbrook is well placed to realise its capability as a new town to provide its residents with good mental and physical health through its design and delivery. The Marmot review (2010)² brought to light the wider determinants of ill-health and presented a robust evidence base for social determinants, being particularly powerful in defining avoidable ill-health and health inequalities. The issues given the highest priority in the Marmot report, and that are embedded in this Cranbrook Plan and outcomes sought from it, are:</p> <ol style="list-style-type: none"> a) giving every child the best start in life enabling all children, young people and adults to maximise their capabilities and have control over their lives b) creating fair employment and good work for all c) ensuring a healthy standard of living for all d) creating and developing sustainable places and communities e) strengthening the role and impact of ill-health prevention. <p>Cranbrook has a very young population and along with Sherford near Plymouth, is one of only two stand-alone major new town developments currently under construction in the South West.</p>

¹ <https://www.england.nhs.uk/ourwork/innovation/healthy-new-towns/cranbrook/>

² *Fair Society, Healthy Lives* Report - <http://www.parliament.uk/documents/fair-society-healthy-lives-full-report.pdf>

Subject	Plan Objectives	Issues and Summary Commentary
	<p>the most effective services</p>	<p>These factors mean that it has very different health and wellbeing needs from the areas around it, and therefore will need a different response.</p> <p>The 2017 Joint Strategic Needs Assessment (JSNA)³ for the area in which Cranbrook is located, alongside Cranbrook specific data provided by the Healthy New Town Executive board⁴ shows that there is a spike in need, particularly around issues that determine social wellbeing such as deprivation, safeguarding and Special Educational Needs. In Devon as a whole, as with the rest of the country, mental ill-health is an increasing issue and is the leading cause of sick leave in the UK (ONS 2016)⁵. Although this is of particular concern, given the large proportion of the population at Cranbrook being of working age, the building of a new town provides unique opportunities to address the multiple causes.</p> <p>In planning for the future development of Cranbrook considerable importance has been attached to ensure the physical and mental wellbeing of residents will be actively promoted. Sustainable travel and in particular the encouragement of cycling and walking as the first choice for people to move around the town is delivered and is supported by involvement with the Sport England Delivery Pilot. The ability to occupy quality homes with access to the natural environment, the provision of good available employment opportunities, and easy access to a diverse range of social and community facilities, will all be essential components of a successful Cranbrook.</p>

³ <http://www.devonhealthandwellbeing.org.uk/jsna/profiles/community-profile/?areaCode=E01019892>

⁴ <http://eastdevon.gov.uk/planning-libraries/cranbrook-plan-pa-2017-18/cranbrookhealthynewtownexecgroup.pdf>

⁵ ONS research note 005914:

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/adhocs/005914estimateofthenumberofdaysofsicknessabsencetakenbyeasonuk2013to2015>

Subject	Plan Objectives	Issues and Summary Commentary
Culture, sport and community	<p>5. A confident, supportive, balanced and diverse community at the heart of decision making</p> <p>6. Enough community, sport, leisure and cultural facilities and spaces to satisfy the needs of the whole community in Cranbrook and to support and encourage creative projects</p> <p>7. Sports and cultural activities are accessible to all, part of the fabric and community of Cranbrook</p>	<p>It is essential that Cranbrook, as a thriving mixed and balanced community, provides the cultural, recreational and community infrastructure required to deliver a happy, healthy new town now and into the future. Cranbrook must have a sense of place. This will come about through a shared sense of community and culture borne from the ability of residents to congregate as community groups in community venues and participate in common activities. All residents should have access to the range of cultural, recreational and community facilities required to create a happy, healthy new town with its own distinctive identity.</p> <p>The Sports, Leisure and Recreation at Cranbrook report⁶ (SLRC report) sets out the evidence base for sports, leisure and recreation facilities to serve the population of Cranbrook. This evidence was drawn from a number of sources including the district-wide Playing Pitch Strategy and Open Space Study, direct engagement with Sport England, National Governing Bodies, Active Devon and local clubs, and various assessments of existing facilities and potential future demand. The policies included within this plan set out the quantity, quality and accessibility requirements for different types of facilities at Cranbrook. These have been identified as being needed to cater for projected demands, balancing the evidence from the above, with the wider proposals and aspirations of this plan and development at Cranbrook.</p> <p>The Cultural Development Strategy sets out the evidence base for the method, means and infrastructure needed for the Cranbrook community to establish their cultural activity and identity for themselves based on robust analysis of existing patterns of cultural activity and engagement in the sub-region.</p>

⁶ <http://eastdevon.gov.uk/media/2302158/SLRC-Addendum-Report.pdf>

Subject	Plan Objectives	Issues and Summary Commentary
<p>Economy and enterprise</p>	<p>8. Cranbrook secures its identity as a small enterprise town with a successful business community, recognised for identifying new business opportunities</p> <p>9. Enough smaller, affordable and critically flexible business spaces appropriately located across the town to satisfy the needs of new and existing businesses from in and around Cranbrook</p> <p>10. All residents can access excellent education to develop the skills they need to fulfil their ambitions</p>	<p>Providing employment opportunities is a crucial and integral part of the development of a happy, healthy new town. Opportunities for employment and learning underpin wider Health and Wellbeing objectives. Whilst in the West End of East Devon and in Exeter there are and will be many job opportunities, it is essential that jobs are provided in and throughout Cranbrook. The Cranbrook Plan therefore seeks to encourage and foster business development from within the town and secure Cranbrook’s identity as an Enterprise Town. The town should attract external businesses that thrive in a vibrant town environment as well as ensuring a creative, confident economic identity developed from within the community.</p> <p>An Economic Development Strategy (EDS)⁷ has been prepared for Cranbrook, which recognises that Cranbrook is in transition, and will remain so in the short, medium and longer term. As the town is built it is inevitable that change will occur in the wider economy, the sub-region and within the community and indeed such change has been seen since the beginning of the town in 2012. As the population grows towards 20,000 people, work opportunities, business growth and local facilities will need to keep pace with this rapidly expanding town.</p> <p>In particular the Economic Development Strategy (EDS) sets out proposals for what is defined as the Cranbrook Business Ladder. This ‘ladder’ will help provide flexible spaces and premises for business to start up in and then expand and grow into with the potential for example to introduce mezzanine floors into the various units. The EDS proposes a package of business support to improve the success rates of small enterprises, and working with schools and colleges to offer relevant training opportunities for young people.</p>

⁷ <http://eastdevon.gov.uk/media/2260179/Cranbrook-Economic-Development-Strategy.pdf>

Subject	Plan Objectives	Issues and Summary Commentary
	<p>11. Vibrant town and neighbourhood centres which are busy and successful both in the day and evening</p>	<p>As a new town, Cranbrook needs to provide opportunities for businesses to develop and experiment and it is recognised that not all businesses will ultimately be successful. However providing the spaces for business to try and be a success is crucial for the development of a flourishing town and one which as part of its aims to promote health and wellbeing seeks to provide opportunities for all within the town.</p> <p>As the town is being developed afresh and in a relatively short period of time, the development of traditional industries and location distributions has not occurred organically over centuries. Good planning for the town will however ensure the range of opportunities and locations for business growth are delivered. At the same time the potential of significant sectors, for example renewable energy and the technology sector, should also be acknowledged.</p> <p>In order to provide accessible and flexible employment opportunities it is essential that employment land is provided across Cranbrook where it is readily accessible to residents (specifically for walking, cycling and public transport) and visitors, rather than being just in one or two locations.</p>
<p>Energy and climate change</p>	<p>12. To deliver Zero Carbon development in Cranbrook</p> <p>13. Be fully informed and prepared for the effects and impact of climate change</p>	<p>Reducing carbon emissions is key to the mitigation of climate change. The UK is legally bound by the Climate Change Act 2008 to achieve 80% carbon reduction over 1990 levels by 2050.</p> <p>National planning policy is clear that planning plays a key role in meeting the challenges of climate change and the transition to a low carbon future. All sectors including the development industry will need to achieve significant carbon reductions to meet these legally binding targets.</p> <p>The Cranbrook Plan looks to ensure that development at the town is resilient to increased risks of flooding as a result of climate change and embedding the provision of Sustainable Urban</p>

Subject	Plan Objectives	Issues and Summary Commentary
	<p>14. Encourage and enable residents to minimise their carbon footprint by reducing the need to travel; but where necessary, to travel using sustainable means, comprising the use of public transport, walking and cycling</p> <p>15. To encourage the purchasing of goods and materials with low embodied carbon during the manufacturing processes by residents and developers and ensure that waste is recycled wherever possible</p>	<p>Drainage systems (SUDs)⁸ within the town, seeking on plot infiltration of surface water in the first instance.</p> <p>The ability to move away from a dependency on fossil fuels requires increased building efficiency, a reduced need to travel by private vehicle, and an increase in the proportion of energy gained from renewable sources. Every opportunity must be taken to minimise the use of energy, through for example a building’s construction form and layout or co-locating uses; but where energy is required, to maximise the opportunities for use of and generation of renewable energy.</p> <p>This approach is summarised within the energy hierarchy, and compliance with this gives the greatest chance of reducing carbon emissions from new development:</p> <ul style="list-style-type: none"> • Minimise the need to travel and enable travel by sustainable means; • Minimise energy demand across the development; • Maximise the proportion of energy from renewable or low carbon sources; • Ensure in-use performance is as close as possible to designed intent. <p>To support energy efficiency within the town and to seek to deliver the zero carbon agenda the plan quantifies a CO₂ reduction target and seeks to embrace the principles of the energy hierarchy including through a layout and other fabric first considerations and connection to and expansion of the existing heat network and private wire opportunities.</p>

⁸ <https://new.devon.gov.uk/floodriskmanagement/sustainable-drainage/>

Subject	Plan Objectives	Issues and Summary Commentary
		<p>Climate change is predicted to reduce the productive capacity of many of the areas that we rely on for food. Creating space within urban areas to produce food is an important consideration for climate change resilience. Allotments, gardens and other community gardening spaces should be designed to enable food production to be a realistic proposition for residents in Cranbrook.</p>
<p>Transport</p>	<p>16. The majority of journeys originating from Cranbrook are made using sustainable transport.</p> <p>17. An integrated, coordinated transport system enabling people to move easily within Cranbrook, to neighbouring settlements and employment centres and beyond.</p> <p>18. An excellent network of safe walking and cycling routes in and around Cranbrook making active transport the first choice</p>	<p>The highway network around Cranbrook is constrained, particularly at major junctions on the A30 and M5 and further capacity upgrades are unlikely. This, along with the need to minimise transport emissions, requires a reduction in the proportion of journeys made by car.</p> <p>The most effective way of reducing car use is to make Cranbrook as self-sustaining as realistically possible to reduce the need to travel in the first place. However, with Exeter as a close neighbour the city will always attract a large number of Cranbrook residents to its jobs and services. With improved infrastructure a number of the resulting journeys could be by bicycle and this is the aspiration. In addition Cranbrook has excellent potential for public transport serving local and onward journeys so it is realistic to expect the majority of journeys starting in Cranbrook to be made using a sustainable mode of transport or comprise active design and travel principles. This will involve the provision of enhanced and extended cycle networks, and the upgrading of the current bus and rail services to maximise journey numbers.</p>

Subject	Plan Objectives	Issues and Summary Commentary
	<p>19. Parking is well designed to not be intrusive or dominant; with enough space to serve the community's needs whilst balanced against an ongoing dependence on the private car</p> <p>20. Be ready for future developments in transport technology</p>	
Landscape and biodiversity	<p>21. Protection must be afforded to the designated habitats and sites which are within access of the development through robust mitigation and enhancement</p> <p>22. Good quality allotments, community gardening spaces and private gardens encourage</p>	<p>Cranbrook benefits from an attractive, mostly undeveloped, surrounding landscape setting. Broadly speaking open countryside lies to the north, east and south/south-east of Cranbrook; on the western and south-western sides at/close to Cranbrook is Exeter Airport, Skypark, the major freight depot (including the Lidl distribution centre) and supporting infrastructure. It is inevitable that as Cranbrook grows outward there will be a loss of countryside to development and whilst this cannot be avoided it is essential that Cranbrook remains a town that is compatible with and sits comfortably within its surrounding landscape and environment.</p> <p>Critically however recreational pressures which can arise from an increase in population, could if not properly managed result in harm to internationally protected environments which are within 10km of the town. While mitigation can in part take the form of on-site enhancement and conservation work, a fundamental component of mitigation lies in the development of Suitable Alternative Natural Green Space (SANGS) which in essence is more easily accessible than the</p>

Subject	Plan Objectives	Issues and Summary Commentary
	<p>people to grow food and enjoy outdoor activity</p> <p>23. Green spaces and landscape features within and around Cranbrook are linked and have a variety of functions, making sure that they are as valuable and accessible as possible to the community and wildlife.</p> <p>24. Buildings and open spaces include nesting boxes and other features to create wildlife habitats that the community can also enjoy</p> <p>25. Features such as ponds and ditches are used to collect storm water and designed so that they help to create attractive</p>	<p>protected environment. With significant areas of green space surrounding the town which is currently largely inaccessible to the public this has the potential to be opened up and therefore off set direct recreational pressures onto less sensitive natural environments. This will be explored in more detail in a SANGs strategy. Such an approach can help to support the objective of ensuring that the town remains compatible with its landscape and the wider green Infrastructure strategy.</p> <p>Green Infrastructure (GI) refers to the network of green spaces and features that add to the health and wellbeing and setting of any town; GI includes parks and green corridors, wetland and wildlife areas, rivers and streams, as well as a multitude of other spaces that add to people's quality of life and support wildlife and biodiversity such as allotments and green corridors.</p> <p>People attach great importance to green infrastructure and the ability to get out on foot and by bicycle to enjoy the green space that is around. There are distinct health and quality of life benefits associated with attractive and accessible green space. As part of the importance placed on health and wellbeing in the town, more and better quality provision of GI is needed at Cranbrook in the future. Dedicated and safe routes for pedestrians and cyclists through green space at Cranbrook and to areas and facilities beyond is critical.</p> <p>The Cranbrook Plan seeks to:</p> <ol style="list-style-type: none"> 1. Locate development where it is best suited, taking account of the landscape character, the visual amenity of the area and flooding; 2. Re-purpose existing landscape elements, e.g. re-use of existing drainage ditches as SuDS and using existing hedgerow network to support a network of cycling and pedestrian routes;

Subject	Plan Objectives	Issues and Summary Commentary
	streets and open spaces	<p>3. Embed the design of SuDS following the SuDS management train within the delivery of a high quality public realm, e.g. design of green verges as rain gardens, the use of permeable paving to improve water quality, etc....</p> <p>4. Provide a variety of soft and hard landscape places which will act as platforms for a multitude of activities,</p> <p>5. Create a network of linked green space providing room for local flora and fauna to thrive and achieve net gains in bio-diversity</p> <p>Cranbrook already has many important and valued green and open spaces. The Country Park, in particular forms an asset for the town and this will need to be complemented by additional high quality green spaces and links through the town and into surrounding areas and countryside. Cranbrook falls within the wider Exeter and East Devon Growth Point and there is a GI strategy for this area⁹.</p>
Design and housing	<p>26. To secure buildings and spaces that are designed to encourage good health and wellbeing in residents and visitors of all ages</p> <p>27. A wide range of well designed homes are</p>	<p>Having a safe and secure home is of fundamental importance to human health and wellbeing and Cranbrook is well placed to expand at a rapid rate providing many homes to new residents. The need for and delivery of new homes should not, however, be at the expense of the quality of the environment and the houses (both internal living space and external setting), other buildings and associated spaces will need to be of high quality and distinctive design.</p> <p>Design is not about things looking good for the sake of it, it is about creating properly functioning places and is a highly complex task that balances a large number of often conflicting interests. Poor design significantly hinders people’s ability to lead healthy, happy and sustainable lives and</p>

⁹ <http://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/green-infrastructure/>

Subject	Plan Objectives	Issues and Summary Commentary
	<p>available to rent and buy</p> <p>28. Spaces and buildings are designed to encourage people to talk to one another, allow people to trade goods and services and can easily be adapted to meet the changing needs of the community</p> <p>29. Spaces and buildings are designed to prevent crime and anti-social behaviour without the need for visible security</p>	<p>can lead to places becoming unattractive, often with people being unable to identify what it is that is wrong.</p> <p>Evidence and good design can be counter intuitive and contrary to people’s initial thoughts on what makes places good. Design issues such as housing density or the level of parking provision would be a case in point, where relatively low densities and high levels of parking, that are often assumed to be desirable, actually produce developments that can be unattractive and do not function well for residents or visitors.</p> <p>Cranbrook is being developed, for the most part, by large volume house builders. There is a challenge inherent in creating unique places from housing units that are standard across the country. However, good masterplanning and urban design can enable character to develop within neighbourhoods by allowing a community to make spaces their own and find what uses would be most suitable for their needs. The developers only provide the early framework on which the community will build their town.</p>
Delivery and flexibility	30. Development at Cranbrook recognises change over time and allows flexibility of use and provides opportunity and space for emerging needs of the community.	Policy in this Cranbrook Plan provides for flexibility to encourage temporary uses to emerge and develop in locations before permanent uses become established. This is especially so for community and business uses and the temporary use of vacant buildings or land for a socially beneficial purpose until such a time that they can be productively used for more permanent activities is supported.

Subject	Plan Objectives	Issues and Summary Commentary
	31. Cranbrook will develop as a sustainable new town, phased to ensure the community's needs can be met both during development and long into the future.	

Use and Structure of this document

Cranbrook Plan Policies Map

- 2.1 The Cranbrook Plan and the policies within it apply in the area defined on the Cranbrook Policies Map as 'The Cranbrook Plan Area'. This Cranbrook Plan Area supersedes the Cranbrook Plan Area indicated on the West End Inset map which accompanies the Local Plan 2013-2031. Policy boundaries and land allocations are set out on the Policies Map and the policies, text and reasoned justification in this plan should be read in conjunction with this map.
- 2.2 Outside of the defined area shown on the Cranbrook Policies Map the policies of the adopted East Devon Local Plan – 2013 to 2031 apply in full.
- 2.3 The Cranbrook Plan Policies Map, for the area it covers, supersedes in its entirety the spatial defined policies shown on the East Devon Local Plan (2013-2031) - West End inset map. Further detail is given on the following page.

Superseded East Devon Local Plan policies

- 2.4 The Town and Country Planning (Local Planning) (England) Regulations 2012, in Regulation 8, item 5, states that:

“(5) Where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy.”
- 2.5 Within the Cranbrook Policies Map area many Local Plan policies will remain in place but some policies will be superseded in part or in full by policies in this Cranbrook Plan. The full set of Local Plan policies, and commentary on whether they are superseded by policy in this Cranbrook Plan, is set out in Appendix 1. It should be noted that this plan introduces new policies for Cranbrook; these new policies are explicitly applicable to the defined Cranbrook Plan area and do not apply in any other part of East Devon. Where policies in this plan supersede existing Local Plan policies, in part or full, then the parts superseded are explicitly identified.
- 2.6 In practical terms and for determining any planning application that falls inside the defined Cranbrook Plan area it will typically be the Cranbrook Plan that is turned to first and then if relevant the Local Plan/other policy documents, including the National Planning Policy Framework. For any proposal outside of the defined area it will be the adopted Local Plan and its Policies Map that will be relevant.
- 2.7 Whilst Cranbrook is now a distinct town, with its own Town Council, there are areas of land and buildings that are close to Cranbrook (including in respect to where Cranbrook might develop in the future) that might not be perceived as being explicitly part of the town. For the purposes of this Cranbrook Plan the term 'at Cranbrook' is widely used. All land that

falls within the area of land shown on the Cranbrook Plan is deemed, in policy terms, to be either 'in Cranbrook' or 'at Cranbrook'.

Strategic Policies

- 2.8 The 2018 National Planning Policy Framework at paragraph 21 requires development plans to make explicit which policies are strategic policies. Policies CB1 – CB15 inclusive, which are set out in the first section of The Cranbrook Plan are those which are to be considered strategic for the purposes of paragraph 21 and relate to the strategy, pattern and scale of development, and the delivery of related infrastructure.
- 2.9 Importantly these policies which seek to deliver the expansion of the town, demonstrate how development and growth which was identified in the East Devon Local Plan 2013-2031 is achieved.

Non-Strategic Policies

- 2.10 As part of The Cranbrook Plan there is also a requirement to identify non-strategic policies which add a level of detail to and support the implementation of the strategic policies already outlined. Within this document, such policies are found within the second section identified as "Development Management Policies" (policies CB16 – CB29 inclusive) and seek to address various aspects of the local economy, environment and society. When read with retained policies of the Local Plan (2013-2031), the implementation of the combined suite of policies set out in both documents deliver both sustainable development and a genuinely Healthy New Town. Both aspects must be at the forefront of all decisions taken in respect of development in the town.

Strategic Policies

CB1. Health and Wellbeing at Cranbrook

CB1 Health and Wellbeing at Cranbrook

To maintain and improve the good health and wellbeing of individuals and the community as a whole at Cranbrook, development proposals must:

1. Develop an attractive and legible built and natural environment that links into its surroundings, including the wider West End of East Devon and Exeter Airport;
2. Ensure that the community has, and is able to have, the infrastructure to support their needs and aspirations both now and into the future;
3. Ensure that all designs, proposals and decisions are coordinated to address the wider determinants of ill-health;
4. Ensure that locations of services and land-uses in Cranbrook integrate well with the community and are within easy reach on foot and bicycle wherever possible;
5. Create well designed streets and spaces using the Healthy Streets Approach to encourage walking, cycling and social activity;
6. Ensure that civic and community buildings are accessible to all and provide facilities to meet the needs of individuals and the community;
7. Ensure that housing is designed around spaces that encourage social activity; and
8. Ensure that housing typologies and resulting densities are appropriate to their locations to support vibrant economic activity and public services.

The Council will require all developers and applicants to demonstrate how proposals meet the objectives of this policy in order to embed positive health and wellbeing outcomes in the planning process.

- 3.1 The creation of a town which has positive health and wellbeing outcomes for all its residents is the overarching and fundamental principle underpinning policy making and decision taking in respect of the expansion of Cranbrook. Good health and wellbeing outcomes will be achieved through a holistic approach to development and delivery and will involve a coordinated multi-agency methodology. With mental ill health now recognised as a significant issue affecting many people in a variety of ways, and in particular suicide rates

being the leading cause of death in both young men and women¹⁰, it is imperative that the factors affecting people's wellbeing are addressed wherever possible. To do this it is necessary to provide places that support good jobs, the means to develop accessible social networks, and the delivery of excellent education, all set within attractive, green environments that enable access to and an appreciation of the natural environment, close proximity and interaction with nature and through all this encourage activity.

- 3.2 From 2016 – 2019 Cranbrook has been one of ten NHS England Healthy New Town demonstrator sites and in late 2017 was selected by Sport England, as part of a joint bid with Exeter, to be one of twelve Local Delivery locations aiming to build healthier, more active communities and tackle stubborn inequalities. Cranbrook therefore can already demonstrate that it stands on a national platform for actively looking to improve health and wellbeing outcomes for its residents and this policy looks to embed this ethos throughout the planning process.
- 3.3 NHS England's priorities for the Healthy New Town program have been to plan and design a healthy built environment, create innovative models of healthcare and to encourage strong and connected communities. The publication "Putting Healthy into Place"¹¹, sought to expand these priorities into the following 10 themes, which while yet to be fully tested provide a useful way of capturing and focusing on the available approaches:
1. Plan ahead collectively
 2. Plan integrated health services that meets local needs
 3. Connect, involve and empower people and communities
 4. Create compact neighbourhoods
 5. Maximise active travel
 6. Inspire and enable healthy eating
 7. Foster health in homes and buildings
 8. Enable healthy play and leisure
 9. Provide health services that help people stay well
 10. Create integrated health centres
- 3.4 Together these strands can be said to be looking to achieve a New Model of Healthy Living for residents.
- 3.5 The Healthy Streets Approach¹² is aimed at creating streets that are pleasant, safe and attractive through the use of 10 indicators which set out conditions which are important to everyone, everywhere. An important measure of success of the Approach will be through an increase in the use of the streets in Cranbrook by pedestrians and cyclists for both essential trips and social purposes. Social interaction is important to positive mental health and

¹⁰ Health Profile for England 2018. UK Government: Accessed 23.11.18 at

<https://www.gov.uk/government/publications/health-profile-for-england-2018/chapter-2-trends-in-mortality>

¹¹ Putting Health into Place: <https://www.england.nhs.uk/publication/putting-health-into-place/>

¹² Healthy Streets Approach: <https://healthystreets.com/home/about/>

therefore consideration of how the built environment can facilitate and encourage such interaction is crucial at the planning stage of development. When designing streets and roads (new and changes to existing), it is imperative that this is approached using health and wellbeing evidence to inform the design as opposed to a purely highway evidence based approach. This will further embed the prioritisation of active travel into the town.

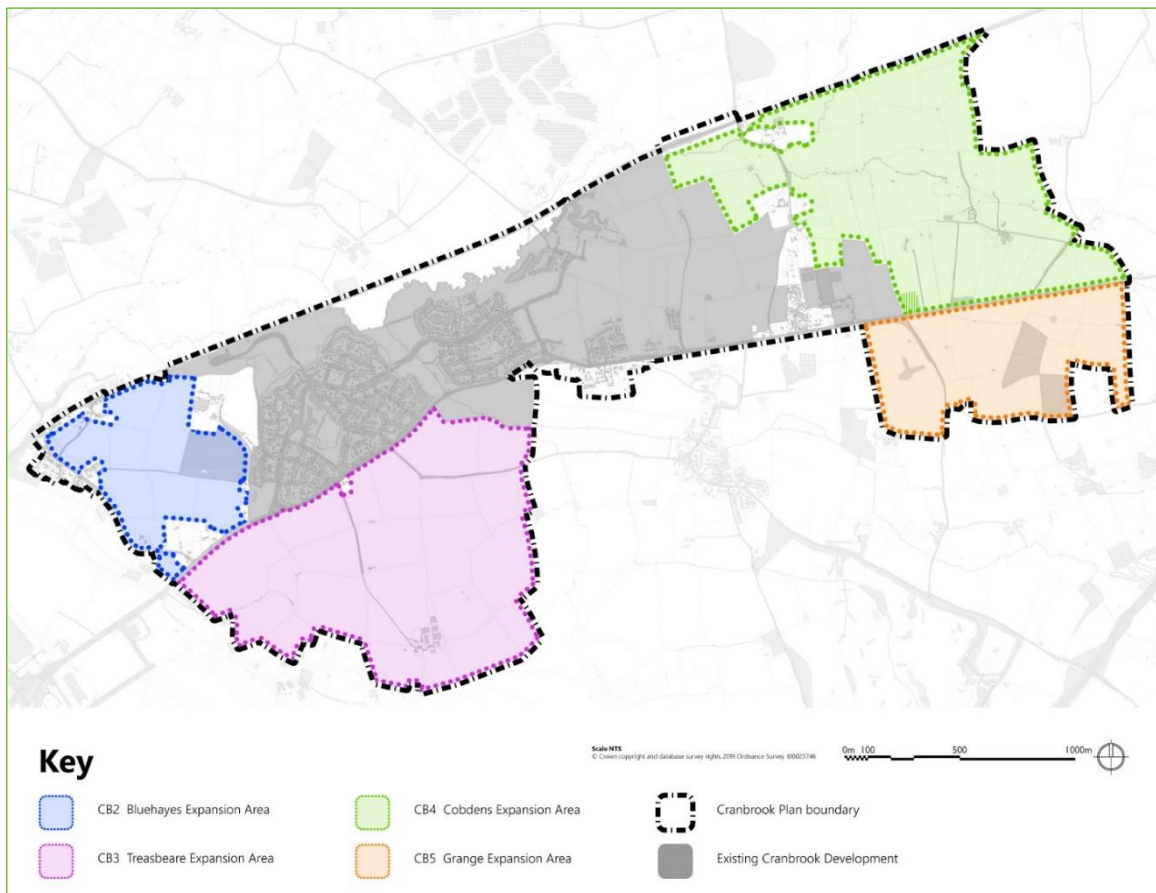


Figure 1 – Plan to show extent of the four expansion areas accommodating growth at Cranbrook

CB2. Bluehayes Expansion Area

CB2 Bluehayes Expansion Area

40 hectares of land at the Bluehayes Expansion Area is allocated for a mixed use development on the Cranbrook Policies Map.

A comprehensive development scheme addressing the Bluehayes expansion area in its entirety and recognising and where possible enhancing existing biodiversity assets and green infrastructure, shall set out provision for all of the following uses, requirements and infrastructure. The scheme shall be agreed in writing by the Local Planning Authority before any planning application for development of all or part of the expansion area is determined. Subsequent applications must comply with the approved comprehensive development scheme. Where land is allocated for specific uses on the policies map, the uses will fall on and within the designated areas:

1. Around 960 new dwellings with typologies of property to reflect the location of development in different areas of the site.
2. A mixed use area to incorporate:
 - a) Land capable of accommodating a community building or meeting space of a minimum of 620 square metres floor space;
 - b) A range of business spaces or premises;
 - c) Other uses compatible with and to support the mixed use area, that may include residential development.

Any business or other use that is permitted within this area must be of an appropriate scale to the mixed use area, such that it mainly serves the needs of the immediate neighbourhood. Proposals must not undermine the vitality and viability of the town centre or the successful delivery of allocated employment land in East Devon's West End (including within the Cranbrook Plan Area).

Any proposals for residential development within the mixed use area must demonstrate adaptability of the ground floor to allow conversion to units that could be used for business and retail activities.

Before an individual parcel of land within the mixed-use area is brought forward for permanent development it should be made available for 'meanwhile uses' for temporary community or commercial development that are compatible with the character, appearance and location of the site.

3. Formal open space recreational land (derived from the existing Bluehayes Parkland) comprising an area of at least 5.5 hectares
4. A 420 pupil place primary school, 57 place facility for early years provision and a room for community use of 100 sq. metres on a site of at least 2 hectares (only in the event that the Bluehayes expansion area is commenced ahead of the Treasbeare expansion area)
5. Formal play space with facilities for children and youth on a combined area totalling 2100 square metres
6. Allotments totalling an area of 0.55 hectare of land. (The identified land requirement excludes the associated land take for peripheral paths and areas for parking and drop off).

Planning applications for development parcels within the Bluehayes Expansion area must provide for pedestrian, cycling and vehicular access up to the boundaries of the parcel/s so as to ensure that adequate links between parcels are provided in the interests of facilitating a comprehensive movement network. This includes providing links between parcels in different ownership or control and ensuring that land is available to facilitate connection with development in the Treasbeare Expansion Area (CB3).

In addition to the expansion allocation that this policy provides for, accompanying land for SANGS provision in accordance with Policy CB15 is also safeguarded. SANGS provision in line with Policy CB15 together with financial contributions for direct enhancement and conservation of the Exe Estuary and Pebblebed Heaths must be provided to ensure that there are no adverse effects of development on European protected sites.

Land within the Bluehayes Expansion Area which currently forms part of the property known as Coachfield House will only be brought forward for residential development if it delivers a vehicular link between Station Road and London Road (B3174).

- 3.6 The Cranbrook Plan allocates land to the west of the existing town and the first phase of completed development, for a comprehensive mixed use scheme as an expansion of Cranbrook. This area lies between the west of England rail line which runs from Exeter St David's to Waterloo to the north of the site, London Road to the south, Bluehayes Lane to the east and Station Road and the properties of Broadclyst Station to the west. In addition, a small parcel of land to the west of Station Road and adjacent to London Road is allocated primarily for benefits it can offer to access arrangements; without these access arrangements being delivered, residential development of the site would not be desirable. The Bluehayes expansion area will define the western extent of Cranbrook with Station Road lying along its western edge. The small settlement of Broadclyst Station exists around

Station Road, beyond which to the west, planning permission exists for a large warehouse and distribution site.

- 3.7 The Bluehayes expansion area will comprise a mix of housing, community and commercial uses that will provide a key route through the town linking the Cranbrook railway station with the Treasbeare expansion area, Skypark, Exeter Airport and existing development at Broadclyst Station.
- 3.8 Within the mixed-use area there is a requirement for business space to be provided. Although no minimum floor space for business use is set in this policy, the Cranbrook Economic Development Strategy¹³ looks to deliver 18.4ha of land across the Town and Neighbourhood Centres and the allocated employment land, which this Plan secures. Applicants will be required to demonstrate how their proposals for development in the mixed use area delivers on the objectives of the Cranbrook Economic Development Strategy in relation to the provision of business floor space.
- 3.9 The Bluehayes expansion area is relatively unconstrained but the relationship with existing developments at Broadclyst Station on Station Road need to be carefully considered as well as the relationship with the railway line to the north. In addition, a small group of properties is accessed off the existing Bluehayes Lane which is a private road. These properties currently enjoy a comparatively secluded location and outlook and careful consideration of the impacts of development upon this area will be required. The Bluehayes expansion area will also form an important part of the Green Infrastructure provision for the town incorporating a formal park area which links into the strategic Clyst Valley Regional Park proposals set out in Strategy 10 of the East Devon Local Plan 2013-2031.
- 3.10 Provided the Bluehayes Park can be suitably linked to other green infrastructure, it will form a significant component of the necessary Suitable Alternative Natural Green Space (SANGS). This is one part of the necessary habitat mitigation which has been evidenced as being necessary within the South East Devon European Mitigation Strategy. This strategy has identified that additional housing within 10km of protected environments, comprising the Exe Estuary and Pebblebed Heaths, can otherwise have an adverse effect on the protected environments. In addition to SANGS which are discussed in more detail within Policy CB15 and the SANGS delivery strategy, on site mitigation measures have also been identified as being required. These can be secured in the form of financial contributions and together with SANGS would ensure that there are no adverse effects on habitats.
- 3.11 The existing Station Road junction onto London Road and the stretch of road to the immediate north is restricted. As a result, vehicular access into and through this expansion area needs careful consideration to ensure that it works technically (from a highway engineering perspective) but also supports the place making agenda that is important for a healthy new town; where homes, facilities and services are well connected and integrated and allow for easy pedestrian and cycle movement. Particular issues that are recognised for this area, note difficulties associated with the number of junctions that emerge onto the

¹³ <http://eastdevon.gov.uk/media/2260179/cranbrook-economic-development-strategy.pdf>

London Road in the vicinity, the routing of larger vehicles and lorries through or around the expansion area and the ability to get pedestrians and cyclists safely across the London Road – all affecting the location and design of a junction into the Bluehayes Expansion Area from London Road.

- 3.12 Together with the proposed development south of the London Road at Treasbeare, these two development areas form the new western gateway to the town and as a result will welcome residents and visitors to the settlement. As such, considerable care must be given to the place making agenda in this area and how infrastructure works with both the topography and existing highway. Particularly relevant to this is the crib lock retained embankment on the south of London Road which is made more awkward by the location of pipework that serves the existing district heating for the town which is adjacent to it. Significant imagination will be needed to ensure that this arrangement represents an opportunity to aid place making rather than simply constraining it.
- 3.13 Additional education provision within the town has been identified as being needed after recognising the number of likely additional pupils that result from the expansion and the lack of existing capacity within the network of schools in surrounding towns and villages. In addition, such provision within walking distance of the houses being provided helps to deliver the aims and objectives of the plan, delivering walkable neighbourhoods and a healthy and self-supporting settlement.
- 3.14 Owing to the lack of existing capacity that exists within the education system locally, Devon County Council have advised that they would expect a primary school to be delivered alongside the first phase of any residential development. Currently it is anticipated that the Treasbeare expansion would come forward ahead of Bluehayes and in terms of place making there are advantages to locating the school within this area. In particular it is noted that within the Devon County Council consultation response to the Cranbrook Plan preferred approach that was published in November 2017, a highly accessible location was sought for the new schools which was within 500m of a neighbourhood centre. It is currently not proposed that Bluehayes would deliver such a centre and in this regard the walkability and accessibility of the school and resulting neighbourhood is diminished if it is divorced from the centre in Treasbeare. However on the basis that the attenuation field north of Bluehayes Lane is brought into public access and a link across the land is delivered, it would result in a walking distance of a little over 500m from the existing neighbourhood centre at Younghayes Road. As a result it is considered that the accommodation of a school in Bluehayes would be supported despite this not being the optimal location.

CB3. Treasbeare Expansion Area

CB3 Treasbeare Expansion Area

62 hectares of land at the Treasbeare Expansion Area is allocated for a mixed use development on the Cranbrook Policies Map.

A comprehensive development scheme addressing the Treasbeare expansion area in its entirety and recognising and where possible enhancing existing biodiversity assets and green infrastructure, shall set out provision for all of the following uses, requirements and infrastructure. The scheme shall be agreed in writing by the Local Planning Authority before any planning application for development of all or part of the expansion area is determined. Subsequent applications must comply with the approved comprehensive development scheme.. Where land is allocated for specific uses on the policies map, the uses will fall on and within the designated areas:

1. Around 915 new houses with typologies of property to reflect the location of development in different areas of the site
2. A mixed use area to incorporate:
 - a) Land capable of accommodating a community building or meeting space of a minimum of 620 square metres of floor space;
 - b) A neighbourhood centre to provide a mix of compatible uses extending to provide at least 1500 square metres gross of ground-floor floor space. This must include a proportion of floor space of A1 use class;
 - c) A range of business spaces or premises;
 - d) Other uses compatible with and to support the mixed use area, that may include residential development.

Any business or other use that is permitted within this area must be of an appropriate scale to the mixed use area, such that it mainly serves the needs of the immediate neighbourhood. Proposals must not undermine the vitality and viability of the town centre or the successful delivery of allocated employment land in East Devon's West End (including within the Cranbrook Plan Area).

Floor space for A use classes will only be permitted where no more than 1 unit of A5 (Hot food takeaway) use class is proposed for every 3 units of other A use classes within the neighbourhood centre. This will be a cumulative calculation, taking into account any existing premises.

Any proposals for residential development within the mixed use area must demonstrate adaptability of the ground floor to allow conversion to units that could be used for business and retail activities.

Before an individual parcel of land within the mixed-use area is brought forward for permanent development it should be made available for 'meanwhile uses' for temporary community or commercial development that are compatible with the character, appearance and location of the site.

3. A 420 pupil place primary school, 57 place facility for early years provision and a room for community use of 100 sq. metres on a site of at least 2 hectares (only in the event that the Treasbeare expansion area is commenced ahead of the Bluehayes expansion area; if this education land in the Treasbeare expansion area is not required for this use the land may be brought forward for residential development)
4. Formal open space and recreational land covering an area of at least 2.1 hectares.
5. Amenity open space across an area of at least 0.75 hectares
6. Formal play space with facilities for children and youth covering an area totalling 2000 square metres
7. A sports hub which delivers
 - a) 2x senior rugby pitches
 - b) 2 x Junior (midi) rugby pitches (Under 11/12)
 - c) 2 x Senior football pitches
 - d) 3 x Junior football pitches (Under 15/16)
 - e) 1 x floodlit Senior all weather pitch (artificial grass pitch)
 - f) 4x floodlit tennis courts
 - g) Associated car and cycle parking spaces
 - h) Sports pavilion to include changing facilities and a club room for use for social and community uses.
 - i) Peripheral multi use path
8. Employment land comprising an area of 4.9 hectares.
9. Suitable Alternative Natural Green Space (SANGS) in accordance with the requirements of Policy CB15.
10. Allotments totalling an area of 0.54 hectare of land. (The identified land requirement excludes the associated land take for peripheral paths and areas for parking and drop off).

11. 5 serviced permanent pitches for gypsies and travellers on an area of at least 0.5 hectares.
12. Land for an extension to the District Heating Energy Centre comprising an area of 2 hectares

New residential and community development shall only be brought forward where it has been demonstrated that adequate on and off plot noise mitigation can be provided to help safeguard the health and wellbeing of residents. In addition development will not be permitted within noise sensitive areas B, C and D as shown on figure 2 below unless it has been evidenced that adequate mitigation in terms of noise has been provided for each area that safeguards the health of future occupiers of the residential properties within the area. It is expected that the mitigation provided should aim to achieve a noise reduction such that the noise experienced by occupiers of the residential dwellings does not exceed 55 decibels in garden spaces. Mitigation measures should also ensure that internal noise levels for residential properties are at acceptable levels.

In addition to the expansion allocation that this policy provides for, accompanying land for SANGS provision in accordance with Policy CB15 is also safeguarded. SANGS provision in line with Policy CB15 together with financial contributions for direct enhancement and conservation of the Exe Estuary and Pebblebed Heaths must be provided to ensure that there are no adverse effects of development on European protected sites

Planning applications for development parcels within the Treasbeare Expansion area must provide for pedestrian, cycling and vehicular access up to the boundaries of the parcel/s so as to ensure that adequate links between parcels are provided in the interests of facilitating a comprehensive movement network. This includes providing links between parcels in different ownership or control and to the Bluehayes Expansion Area.

- 3.15 The Cranbrook Plan allocates land to the south of the existing town and the first phase of completed development, for a comprehensive mixed use scheme as an expansion of Cranbrook. This area lies between London Road to the north of the site, Exeter Airport to the south, Skypark to the west and has a local ridgeline marking the eastern boundary before the land falls away towards the village of Rockbeare. The Treasbeare expansion area will define the south western extent of Cranbrook.
- 3.16 The Treasbeare expansion area will comprise a mix of housing, education, community, sport, employment and commercial uses (together with safeguarded land for the energy centre) that importantly will provide a key location for activity in the town and act as a hub for education and sporting facilities in this area. The sports hub in Treasbeare will be the main hub in Cranbrook and provide a wider range of facilities than at the Ingrams Sports hub further to the east. Within this area the policy identifies a specific range of sports facilities that are required to be delivered. As part of these requirements it is noted that both the AGP

and 2.14ha of grass pitches, are residual requirements from Cranbrook Phase 1 and the associated Section 106 agreement.

- 3.17 Within the mixed-use area there is a requirement for business space to be provided. Although no minimum floor space for business use is set in this policy, the Cranbrook Economic Development Strategy¹⁴ looks to deliver 18.4ha of land across the Town and Neighbourhood Centres and the allocated employment land, which this Plan secures. Applicants will be required to demonstrate how their proposals for development in the mixed use area delivers on the objectives of the Cranbrook Economic Development Strategy in relation to the provision of business floor space.
- 3.18 The Treasbeare expansion area has a number of constraints that need to be carefully considered in the bringing forward of land for development. A local ridgeline marks the eastern extent of the Treasbeare expansion area with the land falling generally to the west and south, with localised undulations. To the east of the ridgeline the land falls sharply, with the village of Rockbeare located further east. Land north of Parson's Lane and south of London Road is presently identified as green wedge by Strategy 8 of the East Devon Local Plan 2013-2031. Much work has been undertaken to look at the landscape and visual impacts of the development of Cranbrook to the south of London Road, both east and west of Rockbeare. In respect of development parcels shown as part of the Treasbeare expansion area, development in the westernmost field identified as green wedge in Strategy 8 is not considered to have a demonstrably harmful impact upon the landscape or visual receptors and will not lead to a perception of settlement coalescence.
- 3.19 To the south of the Treasbeare expansion area lies Exeter Airport. The runway lies on a broadly east-west axis with the terminal building and main hangars associated with the airport lying to the south of the runway. Immediately to the north of the runway and to the south of the Treasbeare expansion area is land used for ground running (engine testing) of aircraft. Combined with general airport noise, this results in noise levels which at times significantly exceed the World Health Organisation's recommended limits for exposure to noise within what will become a residential environment. As such it is critical to the success of this expansion area that suitable mitigation is built into the fabric and orientation/layout of the development. This mitigation will additionally ensure that any plans for the future growth of Exeter Airport are not unreasonably restricted by the proximity of residential development in this expansion area. In respect of the ground running engine testing area located within the airport and the noise generated from this facility, safeguards within the development itself would be inadequate. It has therefore been evidenced that additional mitigation will need to be secured in conjunction with Exeter Airport to adequately address this issue.
- 3.20 Together with the proposed development north of the London Road at the Bluehayes Expansion Area, these two development areas form the new western gateway to the town and as a result will welcome residents and visitors to the settlement. As such, considerable care must be given to the place making agenda in this area and how infrastructure works with both the topography and existing highway. Particularly relevant to this is the crib lock

¹⁴ <http://eastdevon.gov.uk/media/2260179/cranbrook-economic-development-strategy.pdf>

retained embankment on the south which is made more awkward by the location of pipework that serves the existing district heating for the town which is adjacent to it. Significant care will be need in the layout, landscaping and appearance of development within this area to ensure that this “constraint” is regarded as an opportunity and an attractive entrance to the town is designed.

- 3.21 As discussed within the Bluehayes expansion supporting text, it is considered that while a Primary school and its accompanying facilities could be delivered within Bluehayes, the more accessible and better integrated location is found within Treasbeare. This results from the accessibility and legibility that can be derived between the school itself, the neighbourhood centre that would be delivered within Treasbeare and the sports hub that is also located within this area. However the overriding requirement is the delivery of a school within the first phase of residential development that comes forward in any of the expansion areas. In this regard the delivery of a school within the Bluehayes area as opposed to the Treasbeare area would not be resisted. In the absence of a school within the Treasbeare area, the released land could be used to accommodate other identified requirements and a modest increase in the identified housing numbers. The housing numbers referenced in the Treasbeare policy make no allowance for any arising as a result of the primary school being delivered in the Bluehayes expansion area.
- 3.22 Habitat mitigation has been evidenced as being necessary within the South East Devon European Mitigation Strategy. This strategy has identified that additional housing within 10km of protected environments, comprising the Exe Estuary and Pebblebed Heaths, can otherwise have an adverse effect on the protected environments. In addition to SANGS which are discussed in more detail within Policy CB15 and the SANGS delivery strategy, mitigation measures on the protected environments have also been identified as being required. These can be secured in the form of financial contributions and together with SANGS would ensure that there are no adverse effects on these environments.
- 3.23 It is recognised that there is the potential for significant Second World War RAF heritage to be found across the Treasbeare area, noting the relationship and proximity to the airport. In this regard it is expected that development of this area and in particular the delivery of the SANGS surrounding the built development will need to fully respect and make provision for the setting of any features that are found as well as interpretation of such assets.

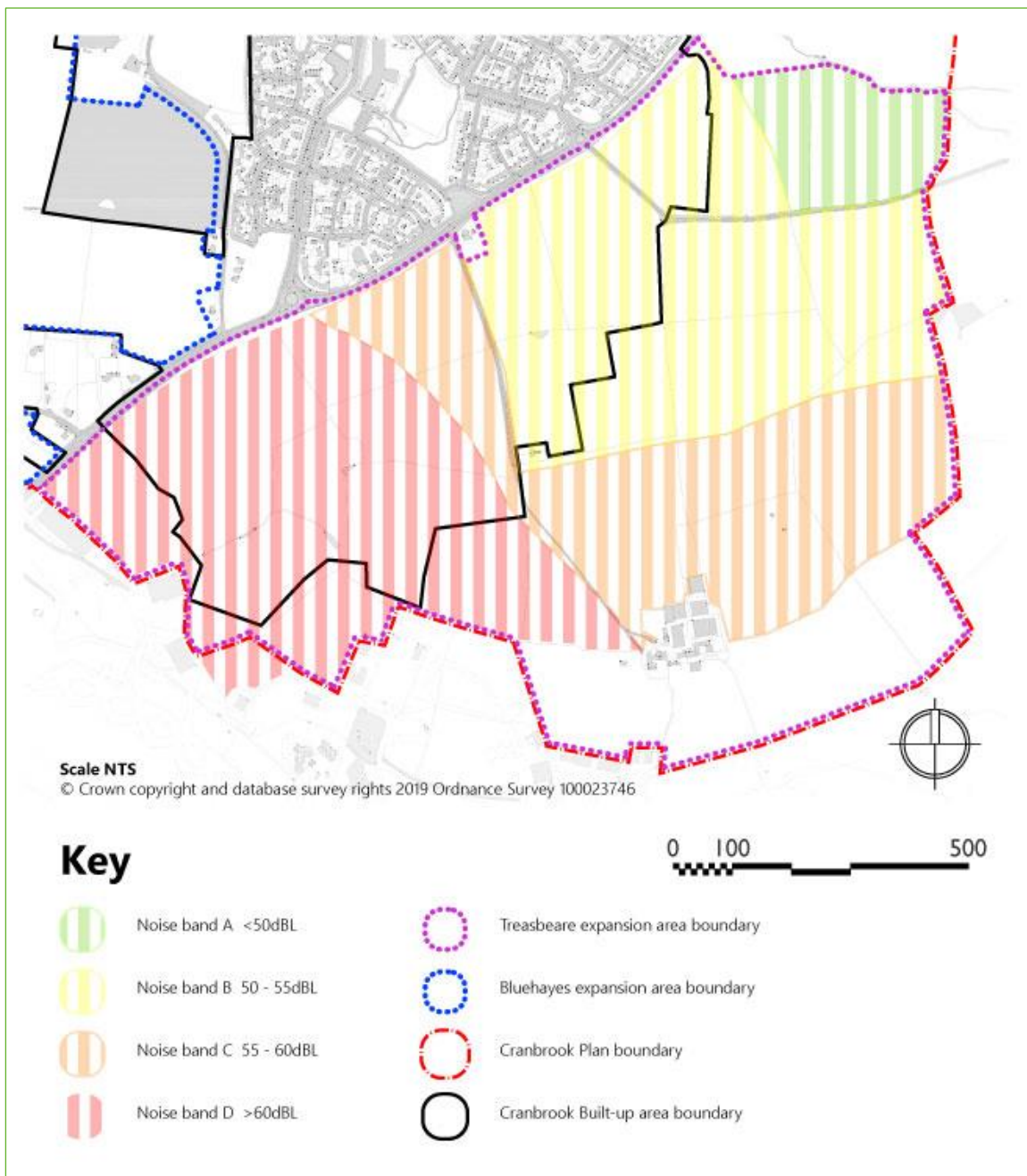


Figure 2 - Plan indicating noise contours in Treasbeare Expansion Area as referenced in policy CB3.

CB4. Cobdens Expansion Areas

CB4 Cobdens Expansion Area

110 hectares of land at the Cobdens Expansion Area is allocated for a mixed use development on the Cranbrook Policies Map.

A comprehensive development scheme addressing the Cobdens expansion area in its entirety and recognising and where possible enhancing existing biodiversity assets and green infrastructure, shall set out provision for all of the following uses, requirements and infrastructure. The scheme shall be agreed in writing by the Local Planning Authority before any planning application for development of all or part of the expansion area is determined. Subsequent applications must comply with the approved comprehensive development scheme.. Where land is allocated for specific uses on the policies map, the uses will fall on and within the designated areas:

1. Around 1495 new houses with typologies of property to reflect the location of development in different areas of the site
2. A mixed use area to incorporate:
 - a) A neighbourhood centre to provide a mix of compatible uses extending to provide at least 1250 square metres gross ground-floor floor space. This must include a proportion of floor space of A1 use class;
 - b) A range of business spaces or premises;
 - c) Other uses compatible with and to support the mixed use area, that may include residential development.

Any business or other use that is permitted within this area must be of an appropriate scale to the mixed use area, such that it mainly serves the needs of the immediate neighbourhood. Proposals must not undermine the vitality and viability of the town centre or the successful delivery of allocated employment land in East Devon's West End (including within the Cranbrook Plan Area).

Floor space for A use classes will only be permitted where no more than 1 unit of A5 (Hot food takeaway) use class is proposed for every 3 units of other A use classes within the neighbourhood centre. This will be a cumulative calculation, taking into account any existing premises.

Any proposals for residential development within the mixed use area must demonstrate adaptability of the ground floor to allow conversion to units that could be used for business and retail activities.

Before an individual parcel of land within the mixed-use area is brought forward for permanent development it should be made available for 'meanwhile uses' for temporary community or commercial development that are compatible with the character, appearance and location of the site.

3. A 630 pupil place primary school, 80 place early years provision and a room for community use of 150 square metres on an area of land comprising at least 2.9 hectares;
4. A 50 pupil place Special Educational Needs school on an area of land of at least 1.2 hectares
5. Formal open space recreational land covering an area of land of at least 3.4 hectares.
6. Amenity open space covering an area of land of at least 1.2 hectares
7. Formal play space with facilities for children and youth across a combined area totalling 3500 square metres
8. An extension to the existing sports hub at Ingrams, through the provision of 1x youth 9v9 football pitch (Under 11's) on an area of land of at least 0.6 hectares (and located in accordance with annotation shown on the policies map). Direct physical connection to the Ingrams sports hub must be provided.
9. Allotments totalling an area of 0.88 hectare of land. (The identified land requirement excludes the associated land take for peripheral paths and areas for parking and drop off)
10. 10 serviced permanent pitches for gypsies and travellers on an area of land of at least 1 hectare
11. Serviced land suitable to accommodate a place of worship and parsonage
12. Serviced land (of at least 1 hectare in size) for a cemetery, which subject to groundwater testing, could be provided on land allocated on the Cranbrook Policies Map for potential Suitable Alternative Natural Green Space

Development of the Cobdens expansion area of Cranbrook will require the undergrounding of the 132kv high voltage power line that crosses the site as indicated in the Cranbrook Masterplan. Planning permission will not be granted for developments that would prejudice the scope for future undergrounding of the 132kv line or for developments which do not accord with the phasing strategy approved pursuant to policy CB7 of this development plan document.

In addition to the expansion allocation that this policy provides for, accompanying land for SANGS provision in accordance with Policy CB15 is also safeguarded. SANGS provision in line with Policy CB15 together with financial contributions for direct enhancement and conservation of the Exe Estuary and Pebblebed Heaths must be provided to ensure that there are no adverse effects of development on European protected sites

Planning applications for development parcels within the Cobdens Expansion area must provide for pedestrian, cycling and vehicular access up to the boundaries of the parcel/s so as to ensure that adequate links between parcels are provided in the interests of facilitating a comprehensive movement network. This includes providing links between parcels in different ownership or control.

- 3.24 The Cranbrook Plan allocates land for comprehensive development for the Cobdens expansion of Cranbrook. The Cobdens area lies to the east of the existing town of Cranbrook, north of London Road and abuts the west of England Exeter-Waterloo railway line. This area is currently characterised by smaller sized fields with a number of mature hedgerows. The most easterly parts of this expansion area are defined by increasingly elevated land that at its highest points affords extensive views in northerly, westerly and southerly directions.
- 3.25 This Cobdens expansion area will contain around 1490 new homes and social and community facilities. It will include provision for a neighbourhood centre and associated mixed and meanwhile uses as well as a large area of Suitable Alternative Natural Green Space (SANGS).
- 3.26 Within the mixed-use area there is a requirement for business space to be provided. Although no minimum floor space for business use is set in this policy, the Cranbrook Economic Development Strategy¹⁵ looks to deliver 18.4ha of land across the Town and Neighbourhood Centres and the allocated employment land, which this Plan secures. Applicants will be required to demonstrate how their proposals for development in the mixed use area delivers on the objectives of the Cranbrook Economic Development Strategy in relation to the provision of business floor space.
- 3.27 The Cobdens expansion area of Cranbrook will need to form a coherent development with its own character and style that distinguishes it from other parts of Cranbrook. This area will ideally be developed as part of a larger comprehensive scheme that includes land immediately to the south of London Road (the Grange area). This Cobdens area will have a distinct character that draws on the local landscape features and existing hedgerows that currently exist on the land.
- 3.28 The Cobdens expansion area will accommodate a modest expansion of the existing sports facilities that are already permitted and under construction at the adjacent Ingrams sports

¹⁵ <http://eastdevon.gov.uk/media/2260179/cranbrook-economic-development-strategy.pdf>

hub. The enhanced hub will serve more than just the residents of the adjacent areas having a Cranbrook wide relevance while bringing together a different mix of sports uses to those provided within the Treasbeare sports hub. The expansion of the sports hub provision will by its nature need to be physically close to and well related to land prepared for sports through the implementation of the Ingram's consent.

- 3.29 Two high voltage over-head powerlines, running in a broadly north-west to south-east direction, cross the Cobdens expansion area of Cranbrook. The Cranbrook Plan requires the undergrounding of the western of these two lines (the 132kv line) which 'frees-up' additional land for development and use¹⁶. The undergrounding of cables will ensure a better quality overall development, overcoming the fragmented and broken pockets of developable land that would otherwise be available. The fragmentation of this area is already compromised by the flood zone associated with local streams and therefore to further split this area would fail the place making objective of the plan. Development schemes that could prejudice the ability to achieve the under-grounding of the cables will not be permitted.
- 3.30 It is expected that the medieval landscape character that is found within this area will need to be addressed through any development that is delivered. More specifically this will mean that development will need to fully respect and make provision for the setting of landscape character and respect the constraints (and opportunities) that this brings. As an approach to development, this is more specifically addressed elsewhere within the Plan.
- 3.31 Habitat mitigation has been evidenced as being necessary within the South East Devon European Mitigation Strategy. This strategy has identified that additional housing within 10km of protected environments, comprising the Exe Estuary and Pebblebed Heaths, can otherwise have an adverse effect on the protected environments. In addition to SANGS which are discussed in more details within Policy CB15 and the SANGS delivery strategy, mitigation measures on the protected environments have also been identified as being required. These can be secured in the form of financial contributions and together with SANGS would ensure that there are no adverse effects on these environments.

¹⁶ Strategy Report relating to Overhead Lines at Cranbrook Expansion Site East (2018).

CB5. Grange Expansion Area

CB5 Grange Expansion Area

30 hectares of land at the Grange Expansion Area is allocated for a mixed use development on the Cranbrook Policies Map.

A comprehensive development scheme addressing the Grange expansion area in its entirety and recognising and where possible enhancing existing biodiversity assets and green infrastructure, shall set out provision for all of the following uses, requirements and infrastructure. The scheme shall be agreed in writing by the Local Planning Authority before any planning application for development of all or part of the expansion area is determined. Subsequent applications must comply with the approved comprehensive development scheme.. Where land is allocated for specific uses on the policies map, the uses will fall on and within the designated areas:

1. Around 800 new houses with typologies of property to reflect the location of development in different areas of the site
2. A mixed use area to incorporate:
 - a) A community building of a minimum of 750 square metres floor space;
 - b) A neighbourhood centre to provide a mix of compatible uses extending to provide at least 1600 square metres gross of ground-floor floor space. This must include a proportion of floor space of A1 use class;
 - c) A range of business spaces or premises;
 - d) Other uses compatible with and to support the mixed use area, that may include residential development.

Any business or other use that is permitted within this area must be of an appropriate scale to the mixed use area, such that it mainly serves the needs of the immediate neighbourhood. Proposals must not undermine the vitality and viability of the town centre or the successful delivery of allocated employment land in East Devon's West End (including within the Cranbrook Plan Area).

Floor space for A use classes will only be permitted where no more than 1 unit of A5 (Hot food takeaway) use class is proposed for every 3 units of other A use classes within the neighbourhood centre. This will be a cumulative calculation, taking into account any existing premises.

Any proposals for residential development within the mixed use area must demonstrate adaptability of the ground floor to allow conversion to units that could be used for business and retail activities.

Before an individual parcel of land within the mixed-use area is brought forward for permanent development it should be made available for 'meanwhile uses' for temporary community or commercial development that are compatible with the character, appearance and location of the site.

3. Formal open space recreational land of an area of at least 1.7 hectares.
4. Amenity open space on an area of land of at least 0.6 hectares
5. Formal play space with facilities for children and youth on an area of land totalling 1800 square metres
6. Allotments totalling an area of 0.47 hectares of land. (The identified land requirement excludes the associated land take for peripheral paths and areas for parking and drop off).

Development of the Grange expansion area of Cranbrook will require the undergrounding of the 132kv high voltage power line that crosses the site as indicated in the Cranbrook Masterplan. Planning permission will not be granted for developments that could prejudice the scope for future undergrounding of the 132kv line or for developments which do not accord with the phasing strategy approved pursuant to policy CB7 of this development plan document.

In addition to the expansion allocation that this policy provides for, accompanying land for SANGS provision in accordance with Policy CB15 is also safeguarded. SANGS provision in line with Policy CB15 together with financial contributions for direct enhancement and conservation of the Exe Estuary and Pebblebed Heaths must be provided to ensure that there are no adverse effects of development on European protected sites.

Planning applications for development parcels within the Grange Expansion area must provide for pedestrian, cycling and vehicular access up to the boundaries of the parcel/s so as to ensure that adequate links between parcels are provided in the interests of facilitating a comprehensive movement network. This includes providing links between parcels in different ownership or control.

- 3.32 The Cranbrook Plan allocates land for comprehensive development for the Grange expansion of Cranbrook. This area of land lies to the south side of the London Road on the eastern extremity of the town. Lying south of part of the Ingrams sports pitches serving the existing town and existing development to its north western edge, the area has a good relationship with the existing town and the Cobdens development proposed to the north.

- 3.33 Within the mixed-use area there is a requirement for business space to be provided. Although no minimum floor space for business use is set in this policy, the Cranbrook Economic Development Strategy¹⁷ looks to deliver 18.4ha of land across the Town and Neighbourhood Centres and the allocated employment land, which this Plan secures. Applicants will be required to demonstrate how their proposals for development in the mixed use area delivers on the objectives of the Cranbrook Economic Development Strategy in relation to the provision of business floor space.
- 3.34 It is important that as with the western end of the town there is an attractive and welcoming entrance to the town at its eastern edge. Historically the London Road has acted as a bypass for the town but it is a key transport route to Cranbrook and will bring visitors close to the centre of the town. The success of Cranbrook as a place to not just live but as a place for business, trade, leisure and recreation relies on it bringing in people from the surrounding area and beyond. The London Road is therefore its shopfront and it is important that the Grange expansion area provides an opportunity for people travelling along the London Road to understand that they have arrived at Cranbrook, what the town is all about, what is available and where to go to access it.
- 3.35 It is critical that the success of Cranbrook as a vibrant and healthy town does not come at the significant cost of its neighbouring communities of which Rockbeare is the closest. Rockbeare is an attractive and historic Devon village set within green fields and it is important that this character is maintained. The village sits down at a much lower level than the London Road and Cranbrook and this topography helps to maintain a physical separation and allows each settlement to retain its identity and integrity.
- 3.36 The land to the east of Rockbeare is very important to its landscape setting and there are a number of key views out of the village in this direction which form the setting of the village and need to be protected for the benefit and identity of the community. This plan seeks to limit development on this side of Rockbeare ensuring that development to the east of the village utilises the existing topography and vegetation to ensure that development does not impose itself on the key views from the village.
- 3.37 The land to the north east of the village is set at the higher level of the London Road and benefits from some existing vegetation. Furthermore there are limited public views from the village out towards this land. It is therefore considered that some development can be accommodated in this area without it being visible from Rockbeare village while still retaining adequate separation to prevent coalescence between the two settlements. The natural steep drop in ground levels to the south of the Grange expansion area acts as a natural boundary to development and would restrict the further expansion of Cranbrook in this direction. This spatial distribution of development retains as undeveloped the land identified as Green Wedge in policy Rock06 of the Rockbeare Neighbourhood Plan.
- 3.38 While distinctly separate from the village of Rockbeare, the provision of open space and other services and facilities within the Grange expansion area presents an opportunity

¹⁷ <http://eastdevon.gov.uk/media/2260179/cranbrook-economic-development-strategy.pdf>

to provide services not currently available to residents of Rockbeare. These facilities would be within easy reach and would avoid the residents having to go into the main part of the town.

- 3.39 The main historical issues with associated with development in this Grange expansion area results from the proximity to the old London Road and the setting of Rockbeare Manor and its associated Garden. Both assets in their varying form have the potential to influence how development is brought forward and it is essential that proper regard is given to these assets. As with other expansion area policies and supporting text, the requirement for this is more specifically addressed elsewhere.
- 3.40 Habitat mitigation has been evidenced as being necessary within the South East Devon European Mitigation Strategy. This strategy has identified that additional housing within 10km of protected environments, comprising the Exe Estuary and Pebblebed Heaths, can otherwise have an adverse effect on the protected environments. In addition to SANGS which are discussed in more details within Policy CB15 and the SANGS delivery strategy, mitigation measures on the protected sites have also been identified as being required. These can be secured in the form of financial contributions and together with SANGS would ensure that there are no adverse effects on these environments.

CB6. Cranbrook Infrastructure Delivery

CB6 Cranbrook Infrastructure Delivery

Residential development that is proposed within the Cranbrook Built-up Area Boundary must demonstrate that it will meet the likely demands of future occupiers of its housing by delivering, either in full or where necessary in part, the identified infrastructure that is necessary to achieve a healthy, active, integrated and friendly self-reliant community.

Unless a consortia of developers who are working together can demonstrate both full cooperation and the ability to deliver all infrastructure identified within the plan which has been costed and found to be viable, it is expected that to achieve delivery in a fair and coordinated way, an equalisation of costs (as far as possible) needs to be achieved. To fulfil this objective, required infrastructure will be divided into one of three categories –

1. Infrastructure to be provided/funded by all development and which is directly relevant to each on plot dwelling

To deliver components within this category, proportionate contributions must be provided by all development that is proposed within the Cranbrook Plan Area.

2. Infrastructure which is site specific to a particular expansion area (under policies CB2 to CB5 inclusive)

To deliver within this category, all site specific infrastructure, including the required land for it must be safeguarded for the identified purpose, and be funded and delivered in full by the host developer on whose land the component lies.

3. Infrastructure which forms common infrastructure and is necessary for the proper functioning of the town but which is not necessarily attributable to a single expansion area

To deliver all non-specific (or common infrastructure) within this category, components must be funded by developers across the Cranbrook Plan area, being calculated so that the resultant total costs associated with the three categories per expansion area are balanced. This may result in this third component being disproportionately costed across each expansion area in order to equalise costs across the four expansion areas together.

More fully the components that fall within each category and which will be ascribed a priority, will be set out in detail within the Cranbrook specific

Infrastructure Delivery Plan. It is expected that the identified infrastructure is delivered in accordance with their identified category, priority and in accordance with or ahead of the phasing agreed through Policy CB7.

Residential development proposals on non-allocated sites within the Cranbrook Built-up Area Boundary must make a proportionate financial contribution to outstanding unfunded or not fully funded infrastructure.

- 3.41 Development of any kind can place demands on existing infrastructure and generate a need for new infrastructure and the expansion of Cranbrook is no different. It is imperative that for a healthy sustainable town, the community enjoys sufficient and appropriate services, delivered at the right time to allow the town and its residents to be largely self-reliant and in so doing help to develop a strong identity whilst also reducing the reliance on the private car.
- 3.42 An Infrastructure Delivery Plan has already been produced for the District as a whole and this includes detailed information on needs and costings for requirements at Cranbrook. The Cranbrook Plan and a Cranbrook Infrastructure Delivery Plan will play a key role in identifying how and where these requirements will be met and delivered, seeking to coordinate both the delivery of the town centre which was consented under the first phase of Cranbrook as well as infrastructure required for the towns expansion.
- 3.43 In theory it would be possible to ensure that every developer either provided a proportion of the infrastructure component on their site, or paid an equivalent financial contribution. However this approach risks becoming unwieldy, long winded and highly inefficient with increased uncertainty over when and how particular components would be delivered. Fragmented delivery, or significantly delayed delivery would in reality fail to deliver any meaningful infrastructure; in sustainability terms, in place making, and in community building; this is an unacceptable approach.
- 3.44 As a result, there is a duty on all – Developers, Councils and Service providers to cooperate and support each other in the delivery of the infrastructure for the expanded town. Through the policy provision it is expected that infrastructure which needs to be provided in a particular area of the expansion should be delivered on site by that developer (although in some circumstances the end provider may wish for a financial contribution rather than direct provision). Such an approach helps to ensure that land is made available and the infrastructure delivered. Whilst this is a direct approach with far greater certainty in terms of delivery, it risks placing undue burdens on developers in one part of the expansion compared with those who operate in a different area. As a result there is a need for costs to be equalised and therefore through this policy a strategy for such an approach is set out which seeks to recognise the components which need direct on site provision as well as those that can reasonably be delivered through a commuted sum payment.
- 3.45 To effect this proportionate and, as far as possible, equalised approach which is more specifically detailed within the accompanying Infrastructure Delivery Plan for Cranbrook it is important to recognise that costs for onsite infrastructure can be offset against commuted sum costs for offsite provision. Such offsetting as evidenced through the Cranbrook IDP would allow a fairer approach to be adopted whilst still ensuring delivery of infrastructure.

This approach would also ensure that future windfall sites and those which are simply too small to realistically deliver on site infrastructure could also be legitimately expected to play their role in delivering the town and its infrastructure.

- 3.46 Ultimately the need for this policy arises following the recognition of the potentially disparate nature of the expansion areas and the risk that without it, a funding shortfall and potentially poor coordination could arise. With multiple owners, land promoters and developers involved, the Council recognises that it will have to play a much greater role in seeking to distribute costs and this policy helps to facilitate this approach.
- 3.47 Infrastructure and financial infrastructure contributions will be secured through the use of S106 legal agreements. The Community Infrastructure Levy does not apply within the Cranbrook Plan Area and therefore all development proposals which will lead to a cumulative impact upon infrastructure requirements will be expected to contribute through the S106 regime in accordance with this policy.

CB7.Phasing

CB7 Phasing

The development of the individual expansion areas identified in policies CB2 – CB5 inclusive must be carried out in accordance with an approved comprehensive phasing strategy for each expansion area.

Phasing strategies must demonstrate how social, community and physical facilities and infrastructure, including Suitable Alternative Natural Green Space, as well as employment land and premises will be delivered alongside or ahead of new housing. The approach to phasing will also require that central parcels of land, close to or adjoining, community and education facilities are developed first with subsequent parcels which are further away from such facilities coming forward as later stages of development, taking account of the need for development to remain viable.

The phasing strategies for the Cobdens and Grange Expansion Areas must demonstrate how the 132kv high voltage power line across the sites will be undergrounded and identify a single continuous route for this.

One of the two primary schools allocated for delivery in this Cranbrook Plan Development Plan Document must be completed and handed over to the education provider before the first occupation of the 30th dwelling across the four expansion areas set out in policies CB2 – CB5 inclusive. The second primary school must be completed and handed over to the education provider no later than:

- The first occupation of the 1650th dwelling across the four expansion areas set out in policies CB2 – CB5 inclusive if the 420 place primary school is delivered first; or
- The first occupation of the 2500th dwelling across the four expansion areas set out in policies CB2 – CB5 inclusive if the 630 place primary school is delivered first.

Each phasing strategy must ensure that an overall co-ordinated approach to delivery is achieved across the Cranbrook Plan Area as a whole.

Each phasing strategy must be approved in writing by the Local Planning Authority before planning permission is approved for the development of the relevant expansion area or part thereof and will be subject of legal agreements to ensure compliance.

- 3.48 The timely and coordinated delivery of housing alongside the social, community and commercial infrastructure is essential to ensure that Cranbrook is able to meet its aspirations of being a truly sustainable and self-reliant town. If houses are brought forward in significant numbers ahead of the related infrastructure there is a risk that the town becomes reliant on Exeter for the greater part of its needs.
- 3.49 If this were to occur and if services and facilities were not forthcoming, a lack of alternative, suitable, accessible and timely modes of sustainable transport, would result in behavioural patterns that were focussed around private transport (in particular the car). Such patterns are notoriously difficult to change once established and a highly car dependant town with the majority of trips being taken out from the town would not only lead to increased inactivity but likely significant congestion on the surrounding road network
- 3.50 Tackling social inequality and health related issues requires easy access to range of facilities and services. These can most effectively be delivered within the local community but clearly require suitable accommodation and related infrastructure. As a current Healthy New Town there is an important emphasis on considering how health related benefits can be built into the fabric of the town thereby reducing the burden that is placed on the more traditional form of health care and the wider health system. One such means is social prescribing but for this to work requires suitable outdoor spaces, halls and informal meeting rooms as well connections between these through the delivery of a coordinated road network and availability of routes such as green lanes. The provision of a community space within three of the four expansion areas (such all future residents have easy access to such a facility) helps to demonstrate the commitment to this approach.
- 3.51 Timely education provision is vitally important to the successful expansion of Cranbrook, helping to strengthen the identity of the town through its ability to educate its own children within its own catchment. The approach set out in this policy seeks to ensure that the schools are delivered in step with the additional housing provision. This will prevent additional pressures being placed on surrounding schools both within and outside the town as a result of additional pupils being generated but without the necessary pupil places. By ensuring that schools are delivered in step with the demand for the additional pupil places it also promotes access to local school services and will limit the likelihood of the need for school drop offs and pick-ups to be made by private car.
- 3.52 When used in tandem with the Cranbrook Infrastructure Delivery policy CB6 and the requirements of the expansion area policies, this phasing policy will ensure that the schools come forward as items of infrastructure which are fully funded by the individual expansion area in which a school is to be located and in the required time, without acting as a ransom upon any one developer. This is due to the requirement for agreed phasing strategies to have regard to the phasing of the other expansion areas so as to ensure that the schools are constructed as per the timings set out in this policy.
- 3.53 Set out in more detail in Policy CB15 and the associated supporting text, it is critical to the phasing of development that SANGS is delivered in a timely fashion. The SANGS delivery strategy recognises that a failure to deliver SANGS appropriately would result in adverse effect on protected environment and in so doing breach the legal duty imposed by The

Conservation of Habitats and Species Regulations 2017. Proper consideration must be given to this requirement in bringing forward housing development.



Figure 3 – pylons located within the Cobdens expansion area which will influence the phasing of delivery within this expansion area

CB8. Cranbrook and Broadclyst Station Built-up Area Boundaries

CB8 Cranbrook and Broadclyst Station Built-up Area Boundaries

The Cranbrook and Broadclyst Station Built-up Area Boundaries are defined on the Cranbrook policies map. Within the built-up area boundaries, development will be permitted if:

1. It would be compatible with the character of the site and its surroundings;
2. It would not lead to unacceptable pressure on infrastructure or services;
3. It would not adversely affect the risk of flooding on or off-site;
4. It would not damage, and where practical, it will support promotion of wildlife, landscape, townscape or significant heritage assets;
5. It would not involve the loss of land of local amenity importance or of recreational value;
6. It would not impair highway safety or traffic flows;
7. It would not prejudice the development potential of an adjacent site.

- 3.54 The development of Cranbrook to-date has taken place largely on site allocations (contained in the old Local Plan 1995-2011) but outside of any defined built-up area boundary. Given both the existing and proposed scale and development of the town, Cranbrook now has a clear identity with sufficient level of facilities and services to justify its own built-up area boundary.
- 3.55 In addition to defining a built-up area boundary for Cranbrook, a separate boundary is defined for Broadclyst Station. Whilst in isolation, this hamlet of residential and commercial properties does not demonstrate the necessary services and facilities to merit a boundary of its own, following the development of the Bluehayes expansion area the hamlet will lie immediately adjacent to Cranbrook and therefore inclusion within a built-up area boundary is appropriate.
- 3.56 In order to ensure consistency across the District, the criteria used for defining the built-up area boundaries for both Cranbrook and Broadclyst Station is the same as that used to define the built-up area boundaries in the Villages Plan, adopted by East Devon District Council in July 2018.

- 3.57 The designation of a built-up area boundary determines areas and locations that are appropriate, suitable and acceptable for development. The boundary serves three primary functions:
1. Sets limits for outward expansion of settlements and in so doing controls the overall scale and location of development that occurs in order to ensure implementation of the plan strategy;
 2. Prevents unregulated development across the countryside and open areas;
 3. Defines (within the boundary) locations where many development types, in principle, will be acceptable because they will complement objectives of promoting sustainable development.
- 3.58 Outside the defined built-up area boundaries shown on the policies map and included for other settlements in both the East Devon Local Plan 2013-2031 and the Villages Plan, Strategy 7 – Development in the Countryside, of the East Devon Local Plan 2013-2031 will apply.

CB9. Public Transport Enhancement

CB9 Public Transport Enhancement

Rail Infrastructure

Provision shall be made for an enhanced frequency of rail services at Cranbrook such that the town is served by a half hourly rail service in each direction.

Bus infrastructure

Provision shall be made for bus services to run on the primary routes at Cranbrook. Bus stops, capable of displaying real time data shall be provided at regular intervals throughout the town so as to adequately serve residential and commercial and employment areas.

Development proposals brought forward within the Cranbrook Plan Area shall contribute proportionately to the cost of the necessary infrastructure to facilitate these public transport enhancements in accordance with policy CB6.

- 3.59 The Devon & Torbay Local Transport Plan (LTP)¹⁸ has a vision of the transport system helping to deliver a low carbon future and a healthy population living in an attractive environment. As part of the drive towards reducing reliance on the private car, the delivery of transport infrastructure at Cranbrook should be provided to enable enhanced bus and rail services to the town and its residents and visitors as part of meeting this vision.
- 3.60 Cranbrook is presently served by an hourly rail service on the Exeter – London Waterloo West of England line. The upgrading of this to a half-hourly service, providing trains to Exeter City Centre with a less than 10 minute journey time is anticipated to result in increased patronage and contribute towards the objectives of the LTP.
- 3.61 A single bus service runs through the town, providing half-hourly buses between Cranbrook and Exeter City Centre to the west and Axminster or Honiton to the east. As the town grows it is likely that a more extensive bus service will be required and this could link to other strategic infrastructure local to the area including Exeter Airport, Sky Park and Science Park in order to provide links between residential and commercial opportunities in the wider locality.

¹⁸ <https://new.devon.gov.uk/roadsandtransport/traffic-information/transport-planning/devon-and-torbay-local-transport-plan-3-2011-2026/>

CB10. Safeguarding of Land for a Second Station

CB10 Safeguarding of Land for a Second New Station at Cranbrook

Land identified on the Policies Map for the provision of a second railway station at Cranbrook is safeguarded. Use of this land for non-railway associated development that could prejudice the provision of a railway station in this location will not be accepted.

Development in the vicinity of the safeguarded land for the second railway station shall be designed to allow for ease of access and promote access to the future station. The form and layout of built development must ensure that new footpaths, cycle ways and roads provide for easy and direct access for prospective future station users.

- 3.62 The existing Cranbrook Station is located north of phase 1 of the development of the town, making it well related to properties and businesses west of the Town Centre and also to the Bluehayes and Treasbare expansion areas. The station enables journey times to Exeter City Centre of 10 minutes, significantly less than the 25-35 minutes it takes by car or bus. However, walking and cycling distances to the station from the phases east of the Town Centre and from the Cobdens and Grange expansion areas are significantly greater, and far in excess of the 1km recommended suitable walking distance to a station, within which use of rail as a mode of transport is more likely.
- 3.63 The delivery of a second railway station to Cranbrook in the location of the safeguarded land would place access to rail services within a reasonable walking and cycling distance for the majority of residents of the extended town and thus significantly increase the likelihood of rail services being used and accessed via active travel. Feasibility work has identified the safeguarded land as the only suitable location for a second station, due to constraints on alternative locations including topography, flooding and proximity to existing stations.
- 3.64 Enhanced frequency on this section of the Waterloo Line is in Devon County Council's existing Local Transport Plan 3, the Devon County Council Transport Infrastructure Plan and East Devon District Council's Infrastructure Delivery Plan. It is therefore something that has a reasonable certainty of progressing.



Figure 4 - Cranbrook Railway Station, located north of the western end of phase 1 of the town.

CB11. Cranbrook Affordable Housing

CB11 Cranbrook Affordable Housing

Affordable housing will be required on residential developments within the built-up area boundary of Cranbrook at a rate of not less than 15% of total dwelling numbers.

Where a proposal does not meet the above rate it will be necessary for an applicant to submit evidence to demonstrate why 15% provision is not viable or otherwise appropriate. An overage clause will be sought in respect of future profits and affordable housing provision, where levels of affordable housing fall below the policy requirement.

The thresholds at which this policy shall apply will be the minimum set out in Government policy or guidance (including any lower thresholds which Local Planning Authorities have the discretion to establish). Where there is no applicable Government policy or guidance there will be no minimum size threshold at which affordable housing will be sought, subject to there being up to date strategic evidence that the general delivery of housing would not be significantly undermined.

Affordable housing shall be provided on-site unless it is exempted through Government policy or guidance, is not mathematically possible or where off-site provision of equivalent value is robustly justified by circumstances such as no registered provider being willing to manage the new affordable units or other legitimate planning reasons. In such cases, off-site provision or a financial payment towards off-site provision will be required and must contribute to the objective of creating mixed and balanced communities.

Affordable housing tenure is sought as 70% social and affordable rented accommodation and 30% intermediate or other affordable tenure. However in periods of depressed markets an alternative negotiated mix to reflect viability considerations and help deliver schemes will be acceptable, subject to complying with Government policy or guidance on the matter. The District Council will consider issues of development viability and housing mix including additional costs associated with the development of brownfield sites, mitigation of contamination and the provision of significant community benefits provided the assessment process is completely transparent and there is full financial disclosure by the applicants. Any submitted viability assessments should be made publicly available.

Affordable housing must be visually indistinguishable from open market housing and must be 'pepper-potted' or dispersed throughout residential developments.

- 3.65 The delivery of affordable housing is vital to the social sustainability of Cranbrook and the wider East Devon housing market and helps to ensure that a suitable and affordable home is available to all.
- 3.66 At a rate of 15%, the delivery of affordable housing for the expansion of the town will be lower than the 30% seen at Cranbrook to date and lower also than the rate sought in the remainder of East Devon through Strategy 34 of the East Devon Local Plan 2013-2031. However, this level of affordable housing delivery is based on a viability exercise which has been carried out and which demonstrates that in order to maintain a level of infrastructure that is required for the delivery of the expanded town, a profit for developers, and a land value that is sufficient to incentivise land owners to release their land for development, a lower level of affordable housing is justified.
- 3.67 This approach mirrors the requirements of the National Planning Policy Framework (2018) and more particularly the legal requirement of the Planning and Compulsory Purchase Act 2004 (Section 39 (2)) where it requires that plans must be prepared with the objective of contributing to the achievement of sustainable development and in addition should be aspirational but deliverable.
- 3.68 Housing and affordable housing does not in itself make a plan sustainable. It is the balance and interaction of homes and the environment, people and the opportunities available to them, layout and the nature of access, that all contribute to sustainability. In this regard the reduction of the affordable housing percentage evidenced here recognises the need for this balance. It helps to ensure that the development of housing and economic activities at Cranbrook is balanced with the delivery of the infrastructure needed to support the community, such as sports and leisure facilities, transport and health infrastructure. In essence the plan delivers the instruction in paragraph 34 of the National Planning Policy Framework (2018), ensuring that the plan sets out a clear expectation of levels of affordable housing and the required infrastructure without compromising the viability. Paragraph 34 states:
- Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.*
- 3.69 As a new town, the entirety of the first phase of development, that is the delivery of the first 3500 houses, has been delivered with 30% affordable housing. This means that with the exception of a small number of original houses within the area, the entire town provides for 30% affordable housing. Whilst vitally important for the health of the early town and delivery of essentially a family focussed settlement, it is now appropriate that the scale and mix of houses is diversified. Part of this diversity can be driven by a lower affordable housing requirement which would allow a greater mix of house types and housing markets to be achieved with the consequential effects of helping to balance the community, social diversity and ultimately the sustainability that is enjoyed by current and future residents. Whilst not

itself a driver for such a reduction such a recognition is a further benefit that will arise from the reduced level.

- 3.70 In seeking to widen the nature and type of housing delivered at Cranbrook, as well as the affordable housing choice it is noted that the National Planning Policy Framework broadens the definition of such housing. The definition now includes affordable housing for rent, starter homes, discounted market sales housing (sold with a discount of at least 20%) and other affordable routes to home ownership, including shared ownership and rent to buy schemes. This gives more flexibility in the types of scheme which could be delivered in order to fulfil the affordable housing requirement, helping to open up the market and widen the range and types of product available.
- 3.71 The National Planning Policy Framework (paragraph 64) sets a default position of not less than 10% of housing on major developments to be available for affordable home ownership; an exemption to this is allowable where to require 10% delivery would prejudice the ability to meet identified affordable housing needs. Policy CB11 proposes that 30% of the total affordable housing is made available for affordable home ownership, which represents approximately 4.5% of the total dwelling numbers across the expansion areas. However, the predominant demand for affordable housing in East Devon is for rented accommodation and therefore it is considered appropriate to continue to require this housing mix, which is consistent with the existing Local Plan 2013-2031. Policy CB12 (Cranbrook Custom and Self Build Housing) sets a minimum requirement of 4% of housing being made available for custom and self-build plots. This will give an overall level of 8.5% of homes being either affordable or developed by people who wish to build or commission their own homes, which is often more affordable than buying a property on the open market.

CB12. Cranbrook Custom and Self Build Housing

CB12 Cranbrook Custom and Self-build housing

As part of meeting housing needs, securing greater housing diversity and encouraging high quality design, proposals for custom and self-build housing at Cranbrook, to be occupied by those persons commissioning or undertaking the construction will be supported.

Not less than 4% of the total number of dwellings proposed in each of the individual Expansion Areas in policies CB2-CB5 inclusive, must be delivered as custom and self-build plots and in accordance with the relevant phasing strategy agreed through Policy CB7. The delivery of self and custom build plots within each of the Expansion Areas must include a proportion of plots as affordable housing.

Where the Local Planning Authority can demonstrate that demand for custom and self-build housing at Cranbrook is higher than 4% of the total dwellings of the unconsented Expansion Areas as part of an annual review of demand, the level of delivery of custom and self-build on an application site must meet the higher level of identified demand unless it can be demonstrated that to do so would render a development unviable.

All custom and self-build plots must be actively marketed to individuals and custom build companies (as appropriate) and reasonably priced to reflect prevailing market conditions. A marketing and pricing strategy shall be agreed in writing with the Local Planning Authority in advance of a plot/s being first marketed. Any plots that have not been sold after 2 years of being continuously marketed in accordance with this policy shall be made available for development on the open market.

- 3.72 The UK has one of the lowest levels of houses delivered through self and custom-build in Europe. Custom and Self-build homes now form a key part of the government's housing strategy and this is enshrined in legislation through the Housing and Planning Act 2016 and Self-build and Custom House Building Act 2015. The National Planning Policy Framework now recognises that in meeting housing need, Local Planning Authorities should include people wishing to commission or build their own homes (para. 61).
- 3.73 A legal definition of self and custom build housing is contained within the Self-build and Custom House Building Act 2015 (as amended) and is summarised in the National Planning Policy Framework as 'Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual.' The Act states that this definition does not include the building of a house on a plot acquired from a person or company who builds the house wholly or mainly to plans or specifications decided or offered by that person

or company. This would normally rule out properties offered by housebuilders as a standard house type with little or no opportunity for customization.

- 3.74 Research suggests that the main barriers to people building their own homes are firstly the lack of available land, and secondly the difficulty in agreeing mortgage finance¹⁹. The expansion of Cranbrook presents a major opportunity to address the main barrier to self and custom-build by allocating a proportion of development for self and custom-build homes.
- 3.75 Custom and self-build housing can be delivered as either market or affordable housing and each meets the needs of different groups in the housing market. The Council would like to see custom and self-build housing at Cranbrook deliver both types of housing in order to meet demand and address need.
- 3.76 It is envisaged that the delivery of custom and self-build housing at Cranbrook will primarily be on fewer larger sites as opposed to being dispersed throughout the expansion areas and individual sub-phases. This is reflected in the Cranbrook Masterplan document, which identifies potential sites where the delivery of custom and self-build housing may be particularly suitable.
- 3.77 Policy H2 of the adopted East Devon Local Plan (2013 – 2031) encourages developers to make at least 10% of plots available for sale to small builders or people wishing to build their own home. As part of the evidence base prepared to support the Cranbrook Plan, research has been undertaken to assess the scale and type of demand for custom and self-build housing in Cranbrook²⁰. This used a demand assessment model and evidence from the East Devon self-build register to estimate the demand for custom and self-build in Cranbrook. To date no custom and self-build has occurred at Cranbrook and the research estimates that 170 plots, equating to 4% of the total allocations, need to be provided to meet the full demand at the town over the plan period.
- 3.78 A review of recent development plan policies elsewhere shows that the requirement for custom and self-build plots on strategic sites is between 2% and 5% (this would equate to between 157 and 392 plots for Cranbrook). The report makes it clear that the estimate of demand for 170 plots is a baseline figure and that further demand could be encouraged through positive promotion of custom and self-build and the delivery of a high quality self-build environment. Providing serviced plots at Cranbrook could also help to meet the demand for plots across a wider area than East Devon.
- 3.79 In addition to meeting the forecast demand for custom and self-build through the provision of plots at Cranbrook there are many reasons for encouraging higher levels of custom and self-build through the Cranbrook Plan. The report on demand concludes that the provision of custom and self-build at Cranbrook would help to diversify the range of house opportunities in the new settlement and attract a range of household types. Such an approach meets the

¹⁹ UK Parliament (2017) *Self-Build and custom build housing (England)*. Parliamentary Briefing paper

²⁰ [Insert link to 3 Dragons report](#)

expectations of Paragraph 72 of the NPPF which requires a variety of homes to meet the needs of different groups in the community to be provided in new settlements.

- 3.80 Encouraging greater levels of self and custom-build homes at Cranbrook will increase the diversity of designs and types of homes delivered. This will be of great value in allowing areas of Cranbrook to develop distinctive characters, and help with the ability to navigate around the town.
- 3.81 Increasing the diversity of developers to include individuals and groups rather than a small number of volume house builders will also provide greater resilience to the supply of homes. It has the potential to increase the affordability of new homes, as a self or custom-build home costs around 20% less to the occupier than the equivalent developer built home.
- 3.82 Self and custom-build homes are much more able to adapt to more challenging site conditions and contexts than homes built by volume developers precisely because they can be custom designed to suit both the occupier and the site. Areas of Cranbrook that would not normally be attractive to a volume developer, perhaps because of challenging topography, may therefore be well suited to custom and self-build. This may also be the case in areas outlined for mixed-use development that need bespoke design. The Local Planning Authority will support and encourage custom and self-build designs to utilise innovative, exciting and unconventional design solutions which respond appropriately to local context.
- 3.83 The Local Planning Authority will promote the Council's custom and self-build register and using data from both the register and other available sources (such as the Buildstore registers) will ascertain on an annual basis the current level of demand for custom and self-build plots at Cranbrook. This will determine the percentage of custom and self-build housing to be delivered at Cranbrook on sites which do not have the benefit of planning permission, in line with policy CB12.

CB13. Delivering Zero Carbon

CB13 Delivering Zero Carbon

All development at Cranbrook will be designed, constructed and perform to the highest practicable and viable whole life sustainability standards possible.

Detailed development proposals will be required to submit for approval a Carbon Reduction Plan that sets out how the development will deliver carbon savings contributing towards the overall plan vision to “**deliver a truly zero carbon new town**” in line with the **Energy Hierarchy**.

Unless specified by policy elsewhere, all developments which propose the construction of new homes or non-residential floorspace must demonstrate that they:

1. **Minimise the need to travel** and where necessary enable travel by low carbon means through:
 - a) Designing neighbourhoods around 400m walkable zones so that occupiers are located within walking distance of basic services and facilities*;
 - b) Being served by good quality walking and cycling links and regular public transport routes;
 - c) Having high quality gigabit-capable digital connectivity in-built; and
 - d) Being effectively masterplanned in accordance with active design principles.
2. **Minimise energy demand and carbon emissions** through:
 - a) Use of passive design, solar masterplanning and effective use of on-site landscaping and Green Infrastructure;
 - b) Achieving a minimum **19%** carbon reduction improvement over Building Regulations Part L (2013) on a building-by-building basis through fabric energy efficiency measures and on-plot renewable energy generation, with preference being for the “fabric first” approach;
 - c) Use of low carbon solutions where additional energy is required for building services such as heating, ventilation and air conditioning.
3. **Maximise the proportion of energy from renewable or low carbon sources** through:

- a) Exploring opportunities for, and implementing private wire arrangements from renewable sources where practical and viable;
 - b) Ensuring connection to the District Heating network delivers the necessary uplifts over and above the carbon reductions achieved through 3(a), to achieve **zero carbon** across the development; and
 - c) Ensuring that, where not provided as standard, the ability to install future Solar PV or Vehicle-to-Grid connections is not precluded.
4. **Ensure in-use performance** of buildings is as close as possible to designed intent through:
- a) **Use of a recognised quality regime** and consistent approach to calculating at design and in-use performance, which ensures that in-use performance is as close as possible to the at-design calculation; and
 - b) **Ensuring at least 10% of buildings deliver in-use energy performance and generation and carbon emissions data** to home owners, occupiers, developers and the planning authority for a period of 5 years after first occupation clearly identifying regulated and unregulated energy use and any performance gap. Where a performance gap is identified in the regulated use, appropriate remedial action will be required.

*Basic services and facilities are taken to refer to educational facilities (pre-school/nursery, primary and secondary schools), convenience shop, employment opportunities and open space/sports provision.

3.84 Climate change has been described as the greatest threat to future generations²¹, to the global economy²², and global health²³. In response to this threat, the UK has enshrined in law, through the Climate Change Act 2008, legally binding targets for the 80% reduction of 1990 level carbon emissions by the year 2050. In addition to this, the UK's commitment to the Paris Agreement requires limiting the rise in global temperatures to well below 2°C above pre-industrial levels and sets an intention to limit the increase to 1.5°C. The

²¹ Park, M. (2015) *Obama: No greater threat to future than climate change*. CNN [online] <http://edition.cnn.com/2015/01/21/us/climate-change-us-obama/> Accessed 29/5/2018

²² World Economic Forum (2016) *Global Risks Report 2016* [online] http://www3.weforum.org/docs/GRR/WEF_GRR16.pdf Accessed 29/05/2018

²³ World Health Organisation (2015) *Climate Change and Human Health*. WHO [online] <http://www.who.int/globalchange/global-campaign/cop21/en/> Accessed 29/05/2018

Intergovernmental Panel on Climate Change report published in October 2018 further strengthens the need for immediate action and to limit the increase to 1.5°C. National planning policy identifies that planning plays a key role in meeting the challenges of climate change and the transition to a low carbon future.

- 3.85 The “*Low Carbon and Climate Change Evidence Base for the Greater Exeter Strategic Plan*” (Low Carbon Study) evidences that the Greater Exeter Strategic Plan area (which includes East Devon) will need to reduce carbon emissions by 60.7% by 2040 from 2014 levels in order to be on track to meet the legally binding UK target for 2050.²⁴ Influencing the carbon output of new developments is one of the few ways in which Local Authorities can have a tangible impact upon meeting these targets and with the significant new growth planned at Cranbrook, it is important that this opportunity is maximised through the Cranbrook Plan.
- 3.86 The Low Carbon Study sets out an energy hierarchy that new development should comply with, based around reducing the need to use energy before choosing to meet energy needs in an efficient and sustainable way. ‘The Energy Hierarchy’ sets out the order in which anyone involved in the built environment and place making, should structure their approach towards energy demand. This is captured in the following seven tiers:
- 1) **Development Location** – Reduces transport need and gives access to sustainable transport;
 - 2) **Site master planning** - Solar master planning optimises use of natural light and heat;
 - 3) **Building Fabric** - High performance fabric gives maximum thermal efficiency;
 - 4) **Building Services** - Low carbon building services support fabric measures;
 - 5) **Clean on-site energy** - Low carbon / renewable energy reduces unavoidable emissions;
 - 6) **Off-site measures** - Developer contributions finance offsite carbon reduction where onsite measure are not practical/viable;
 - 7) **In-use performance** - To ensure actual performance aligns with design intent;
- 3.87 Policy CB13 simplifies this hierarchy into four themes and identifies how development at Cranbrook should comply.
- 3.88 Development location, including co-location of homes, employment, shops and leisure facilities as part of a mixed development, provides the most effective way to reduce energy use and carbon emissions, through **minimising the need to travel**. The design of neighbourhoods plays a major part in reducing energy, particularly by reducing the need for people to travel. As a result, it is important that neighbourhoods are designed to support employment, retail and other uses so that people can go about their day-to-day lives within their own town and community minimising their need to travel by private and other vehicle

²⁴ University of Exeter Centre for Energy and the Environment (UoE CEE) (2018) *Low Carbon and Climate Change Evidence Base for the Greater Exeter Strategic Plan [(Low Carbon Study)]* [online] www.gesp.org.uk/evidence Accessed 06/07/2018, pp.21-22

based transport. Where travel is required, development should ensure that it is possible by active means and sustainable public transport. Digital connectivity is also key to reducing the need to travel by enabling home working and access to online services.

- 3.89 **Minimising energy demand** through energy efficiency measures, should always be considered ahead of meeting demand from low carbon sources. The use of solar masterplanning and passive design principles, together with a focus on high performance building fabric and use of high efficiency, low carbon building services where necessary can ensure energy use is minimised when considered holistically. As such, a “fabric first” approach is promoted in meeting the building-by-building requirement for a 19% carbon reduction improvement over Part L of the Building Regulations (2013). This requirement applies to both new dwellings and new non-residential floorspace.
- 3.90 Remaining carbon emissions should then be abated and required energy delivered through **maximising the proportion of energy from renewable or low carbon sources**. This can be through on-plot installations such as roof-mounted solar PV panels, or if this is not feasible or viable, through private-wire arrangements to off-site or nearby installations. It is important that buildings are designed to be “PV-ready” so that even where not supplied as standard, an occupier can easily install PV panels in the future without needing to make unreasonable or prohibitively expensive alterations to the fabric of the building or electricity grid connection. In addition, it will be important to enable electric vehicles to discharge to the grid (Vehicle to Grid) and help meet the power needs of the building. In both cases, this will require ensuring a “three phase” electricity grid connection is provided to enable greater capacity, flexibility and two-way flows.
- 3.91 Cranbrook has benefitted from the development of one of the largest and most successful district heating networks in the UK as its means for providing heating and hot water to connected buildings across the town. The heat network is served by a Combined Heat and Power (CHP) Energy Centre on neighbouring Skypark, which delivers a true decentralised energy network providing heat and hot water to connected buildings through a network of underground pipework, and electricity to connected users through private wire arrangements. It is proposed that this decentralised energy network is continued throughout the expansion of the town, ensuring that energy is generated and distributed close to where it will be used. Decentralised energy has a number of benefits including, reduced losses of energy through transmission, ability to use waste heat from energy generation, lower carbon emissions and improved energy security²⁵. In particular, heat networks allow for on-going decarbonisation far more easily, than needing to retrofit individual heating solutions in every individual building. Achieving “zero carbon” will require migration of the network from gas CHP (as is currently the case) to renewable sources including waste heat such as from the

²⁵ Ofgem: Our strategy for regulating the future energy system
https://www.ofgem.gov.uk/system/files/docs/2017/08/our_strategy_for_regulating_the_future_energy_system.pdf

proposed FAB Link Converter Station²⁶. Should technical/viability evidence arise which, demonstrates that a zero carbon solution cannot be delivered through connection to the network, then an alternative solution which still achieves the same vision to “deliver a truly zero carbon new town” will be considered in line with the Energy Hierarchy.

- 3.92 Often, building performance and emissions reductions are not realised “in use”. This performance gap, results in far less carbon reduction than anticipated, increased costs for building users, and the need for expensive retrofit. Policy CB13 aims to ensure that the “**in use**” performance of buildings is as close as possible to the way they were expected to perform. This is best achieved through implementing a recognised quality regime (such as Passivhaus or BRE’s Quality Home Mark / BREEAM) and monitoring in-use data. Where a performance gap is identified, enforcement action will be taken.



Figure 5 - Aerial photograph of the existing Energy Centre which serves Cranbrook on a district heating network. The land to the right of the energy centre is the western extent of the Treasbeare Expansion Area. (Image credit: Still Imaging)

²⁶ University of Exeter Centre for Energy and the Environment (UoE CEE) (2016) *Heat Network Strategies for the West End of East Devon* [online] available at: <http://eastdevon.gov.uk/media/2260200/heat-network-strategies-for-the-west-end-of-east-devon-final-draft-030117.pdf> [accessed 10/01/2019]

CB14. Safeguarding of land for energy uses

CB14 Safeguarding of Land for energy uses

Land identified on the policies map is safeguarded for decentralised low carbon and renewable energy uses which directly benefit Cranbrook's energy needs and helps to deliver the vision for a truly zero carbon town. Such uses which may include smart energy storage and management infrastructure, must be able to usefully contribute heat towards the existing and expanded heat network and/or power to nearby users through private wire arrangements or similar.

- 3.93 Cranbrook should ensure that renewable energy, energy storage, and electric car charging, as one component of a wider goal for delivering a sustainable town, are issues incorporated into development proposals to lower the carbon usage in line with national targets.
- 3.94 The vision for Cranbrook as a zero carbon development has so far been based on connection to a district heating network served by a combined heat and power (CHP) Energy Centre, and delivery of private wire electricity connections.
- 3.95 The existing Energy Centre is located immediately to the west of the Treasbeare expansion area. The Energy Centre is currently gas fired; in order to ensure that connection to the heat network achieves greater carbon savings than the national electricity network, and to meet with the vision and policy aims of CB13 for the delivery of a truly Zero Carbon town, the heat network will need to be decarbonised. This will require transition to alternative low carbon and renewable energy sources. As such, 3 hectares of land is safeguarded in close proximity to the existing Energy Centre for delivery of proposals that can facilitate this transition.
- 3.96 This land is in the locality of the existing Energy Centre and is situated in close proximity to both land allocated for employment uses (which could potentially bring forward new private wire opportunities), and Exeter Airport (which potentially presents an opportunity to facilitate the decarbonisation of aviation transport). If development is brought forward on this safeguarded land, appropriate attention to the design and setting of the development will be needed. This is particularly the case where the areas are close to and have visual prominence from housing that will be developed in the Treasbeare area and views from the London Road.

CB15. Delivery of Suitable Alternative Natural Green Space

CB15 Delivery of Suitable Alternative Natural Green Space (SANGS)

100 hectares of land is safeguarded for Suitable Alternative Natural Green Space (SANGS) on the Cranbrook Policies Map.

Residential development schemes shall only be brought forward where they can demonstrate that suitable mitigation is being made available to ensure that there is no likely significant effect on the Pebblebed Heaths and Exe Estuary. These environments are designated as Sites of Special Scientific interest, (SSSI); Special Area of Conservation (SAC); Special Protection Area (SPA); and in the case of the Exe Estuary, RAMSAR.

As part of the required mitigation, Suitable Alternative Natural Green Space at a ratio of at least 8ha per 1000 net new population generated by residential development schemes must be provided on a phased basis and made available for use prior to the first occupation of the residential dwellings in each respective phase. Residential occupancy shall be taken at 2.35 persons per dwelling.

To comprise SANGS, land that is made available for such purposes, shall meet the following definitions and/or be so located to facilitate the delivery of the definition:

Be created from:

1. Existing open space of SANGS quality with no existing public access or limited public access, which for the purposes of mitigation could be made fully accessible to the public, or;
2. Existing open space which is already accessible but which could be changed in character so that it is more attractive to the specific group of visitors, or;
3. Land in other uses but which could be converted into a SANGS.

and deliver the following:

- a) Adequate parking which is free or benefits from significantly reduced charges for vehicles and bicycles for visitors;
- b) Car parks which are easily and safely accessible, and which are designed with an appropriate layout which allows for adequate mitigation to limit the intrusion on the character and appearance of the local environment;

- c) Car park locations where dogs can safely be taken from the car to the SANGS off the lead;
- d) Easy access between the SANGS and adjacent housing to facilitate access by pedestrians/cyclists as well as car based transport;
- e) Access points with signage outlining the layout and routes;
- f) Limited and sympathetic visitor infrastructure (benches, dog bins etc.)
- g) Safe natural spaces without intrusive artificial structures, except in the immediate vicinity of the car park/s;
- h) Paths that are suitably signposted and available for use in all weathers all year around (this can include the introduction of boardwalks in wet sections);
- i) A circular walk that starts from a car park;
- j) Circular walk(s) of at least 2.3km around the SANGs;
- k) A variety of habitats for visitors to experience (e.g. woodland, scrub, grassland, heathland, wetland, open water);
- l) Largely unrestricted access within the natural space (including space for dogs to exercise freely and safely off the lead);
- m) A natural space that is free from unpleasant smells, significant noise and waste material of any form that would otherwise harm its amenity value.

It is expected that SANGS provision will be made available on site and where possible should ensure that designs for the Green Space complement heritage assets that are found on site to help the conservation and enjoyment of the historic environment.

Accompanying applications for the provision of SANGS shall be an appropriate delivery, enhancement and management strategy which shall include a masterplan.

The delivery component of the strategy shall direct the establishment of the SANGS to ensure that it is available for use ahead of relevant occupations (agreed through the phasing strategy) and include details of advertisement and publicity.

The management component shall demonstrate

- how the SANGS will be maintained in perpetuity (comprising a minimum period of 80 years and could include the use of legal agreements to ensure that sufficient safeguards/step in rights are in place),
- an identification of the full costs required for this, and
- a financially sustainable means by which it can be delivered over the in perpetuity period.

It is expected that financial arrangements necessary to deliver the future management must be in place and agreed with the Local Planning Authority prior to the first use of the relevant area of the SANGS.

Only where it is wholly impractical to meet the definitions, should off-site delivery or an off-site financial contribution be required. Any such contributions would be based on identified mitigation costs at the time of determination.

- 3.97 The Conservation of Species and Habitats Regulations 2017 places an obligation on all competent Authorities that before they can grant any permission favourably they must be confident that the development proposal would not lead to an adverse effect on the designated sites. In the case of Cranbrook, evidence indicates that there are two designated environments that are within a distance where residential development, which is not accompanied by suitable mitigation is likely to result in a significant effect and thereby must be resisted.
- 3.98 The sites in question are identified as the Exe Estuary, designated as a Special Protection Area (SPA) and RAMSAR and the Pebblebed Heaths which is designated as a SPA but also a Special Area of Conservation (SAC). The main reason for the designation of the Estuary is its support of winter estuarine bird populations while the Heathland recognises an area of extensive lowland heath habitat and the associated bird populations that it supports
- 3.99 Significant work has been undertaken to understand the likely effects of development on these environments as well the appropriate mitigation that is required to ensure that there is no likely significant effect as a result of relevant proposals. This work has been brought together in the publication of the South East Devon European Sites Mitigation Strategy, published by Footprint Ecology in June 2014²⁷. This provides significant detail and evidence with regard to the likely impacts of development, the distance from which effects are likely to occur and the necessary mitigation that needs to be secured to prevent such effects.
- 3.100 In respect of Cranbrook, the report establishes that the town and all expansion areas fall within respective distances where effects are likely to occur to both environments and as such a full suite of mitigation is required. This approach is backed up by more recent town surveys, which amongst things have sought to understand the locations travelled to, for amenity and recreation of the town's inhabitants. While small in numbers in these surveys indicates the early residents of the town have indeed journeyed to both the Heathland and in particular the Exe Estuary. Without mitigation it is not anticipated that such a pattern of dispersal would change and therefore it is correct to require mitigation as part of the expansion proposed.

²⁷ South East Devon European Mitigation Strategy - <http://eastdevon.gov.uk/planning-libraries/evidence-document-library/chapter8.4-environment/env038a-footpringecologysedevoneuropeanmitigationstrategy.pdf> UPDATE LINK TO CRANBROOK PAGE

- 3.101 Building on the 2014 report and subsequently reaffirmed in the Habitat Regulation Assessment that accompanies this development plan document, there is a need for mitigation to take two forms.
1. On site mitigation which can take the form of a financial contribution. Such contributions allow for direct work to be undertaken on and within the environments for such activity as visitor education, rangers, conservation and enhancement measures etc.
 2. Delivery of Suitable Alternative Natural Greenspace (SANGS). This is natural green space which is free from urban influences and provides a genuine alternative to the particular designated environments. Evidences suggests that it doesn't need to replicate the environment but does need to be convenient and provide a genuine and credible alternative that has the potential to intercept people on their journey to a protected site. Importantly it needs to enable them to enjoy green space in a less fragile and sensitive environment. It is for these reasons that the quantum of such space is important. If too little space is provided, or if the areas used are inundated by water for significant periods of time (without suitable access provision being made available), then there is a risk of over-crowding and failing to deliver that sense of being in the countryside and away from people.
- 3.102 In the case of the proposed SANGS shown within the Cranbrook Masterplan these have been identified on the basis of the now widely accepted proportion of 8ha per 1000 population but with a population density of 2.35 people per dwelling. This slightly higher figure reflects growing evidence that is emerging about the town which recognises that as a young town with a predominance of families, the average occupancy is higher than is found elsewhere within East Devon.
- 3.103 Where possible an attempt has been made to ensure that each of the primary land owners within the development are able to deliver SANGS on land under their control. This approach enables the delivery of strategic scale SANGS provision as outlined in the SEDESMS report (and thereby realises the wider and increased benefits of interconnected SANGS parcels). With such an approach to delivery however it is important that adjoining parcels should be so designed that they function together as a larger whole. Without such connection there is a risk that areas would otherwise comprise isolated pockets of green space and fail to deliver the necessary mitigation.
- 3.104 The policies map shows around 100ha of land as being allocated for SANGS which is spread across a number of different land owners and developers. The total area is in excess of the minimum 78 hectares as required by policy based upon the number of houses allocated. This approach ensures that adequate SANGS provision can be made, includes and allowance for any additional housing over and above the figures set out in policies CB – CB5 and recognises that the good practice of 8 ha per 1000 population is better regarded as a minimum threshold. It also helps to address issues where an individual land owner/developer is unable to provide their own SANGS. In such a scenario the approach helps to reduce the potential for any one land owner to be beholden on others where a ransom situation could otherwise ensue. While it is considered the responsibility of

individual developers to ensure that they can deliver adequate mitigation, it is recognised that this can't be realistically achieved for all parcels of development. In such locations and in exceptional circumstances an off-site financial package could be considered, although the costs associated with this approach will need to accurately reflect the actual costs of acquisition, delivery/enhancement and maintenance. To assist with SANGS delivery a specific strategy has been prepared and accompanies this plan as part of the evidence base.



Figure 6 – Dawlish Countryside Park, which has been provided as SANGS mitigation

Development Management Policies

CB16. Design Codes and Place Making

CB16 Design Codes and Place Making

Development in the expansion areas allocated in policies CB2 – CB5 inclusive must be brought forward based on a Design Code/s which is specific to each expansion area or phase of development and which has been developed in advance of the detailed applications. The Design Codes will be subject of the agreement in writing of the Local Planning Authority.

Both the Design Code/s and all subsequent or other detailed proposals which come forward within the wider plan area, must demonstrate how they have regard to the layout of development indicated in the Master plan shown at Figure 8 of this Cranbrook Plan and how they comply with the following 12 principles adapted from Building for Life 12:

1. **Connections** – The scheme shall demonstrate integration with existing connections and the creation of new ones whilst respecting existing buildings and land uses around the site;
2. **Facilities and services** – Development shall demonstrate safe and convenient access to a range of community facilities;
3. **Public transport** – Development shall provide for good access to public transport and evidence how it can reduce car dependency;
4. **Local Housing Requirements** – Developments shall have a mix of housing types and tenures to suit local requirements, recognising the need for variation in size and tenure in order to provide a balanced community;
5. **Character and heritage** – through layout, design materials and landscaping the development shall ensure that it is locally inspired or distinctive and respects the historic landscape character and features and all heritage assets;
6. **Working with the site and its context** – development proposals shall take advantage of and ensure that they work with existing topography, landscape features, wildlife habitats, site orientation and microclimates, and heritage assets;

7. **Creating well defined streets and spaces** – developments shall ensure that buildings are designed and positioned with landscaping to define and enhance streets and spaces;
8. **Legibility** – routes and connections shall be provided in such a way that it is easy to find your way around the growing settlement;
9. **Streets for all** – streets shall be designed in a way to encourage low vehicle speeds, be accessible and legible for all users and allow these spaces to function as social spaces;
10. **Car parking** – car parking shall be provided and laid out so that it integrates well with the design of the street without dominating the area;
11. **Public and Private spaces** – Proposed layouts and boundary treatment will need to ensure that spaces are attractive, safe and properly defined and managed; and
12. **External storage and amenity space** – development shall ensure that it is provided with adequate external storage space for bins, refuse and recycling; cycle parking provision and outside amenity space for clothes drying.

- 4.1 Local Authorities are responsible for securing good quality design of new homes and places and have been given further powers from Government to reject planning applications which do not represent good quality design through the National Planning Policy Framework.
- 4.2 Well-designed buildings and public spaces increase the value of physical capital and help to build social capital. Bad quality design can lead to the decaying of towns and cities and can further lower the quality of life and limit employment opportunities.
- 4.3 The East Devon Local Plan (2013-2031) highlights the need for design and local distinctiveness through Policy D1 but this is not specific to the nature and needs of Cranbrook where there are four large scale expansion opportunities being progressed. To help deliver an attractive and functioning place, it is important that the expansion areas are developed to a good standard of design with appropriate connectivity and a distinctiveness at all levels – those ranging from the individual house types, sub parcel, parcel and whole phase level. This is not explicitly achieved within the existing Policy D1 of the Local Plan and therefore it is brought together in this design led policy which explicitly covers a number of issues.
- 4.4 Importantly the policy sets out the requirement for a design code to be agreed for each of the expansion areas. It is expected that these would specifically address such aspects as housing typology, site layout, (recognising key routes and linkages) and the location and form of such as aspects as squares and spaces to aide good place making. In addition it is considered appropriate that plot layouts should maximise the use of passive solar and provide adequate outside amenity for the respective occupiers. Both of these aspects are

important for helping to deliver sustainable homes - through natural heating as a result of plot orientation and through healthy homes where there is adequate outside amenity space for recreation as well as activities such as drying clothes.

- 4.5 In terms of movement, the policy recognises the requirement for development to contribute positively to the achievement of a high quality, effective and safe transport system within and around Cranbrook which promotes sustainable transport choices and facilitates sustainable growth.
- 4.6 The Plan and accompanying masterplan evidence document has therefore premised the design of Cranbrook on a well-connected grid of mixed-use and streets with a mix of travel modes (walking, cycles, public transport and cars) to encourage walking, and to create a clear sense of place.
- 4.7 There are significant heritage assets in and around Cranbrook and its expansion areas that must be appropriately recognised and considered as part of development proposals. These include the Roman Road and land surrounding London Road, the medieval field patterns around Cobden, the RAF history found in Treasbeare, the Grade II listed farmhouse in Treasbeare; the setting of the Rockbeare House registered park, and the Grade II listed Rockbeare bridge. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 4.8 In considering any scheme for development within the expansion areas, it is essential that proper regard is given to the heritage assets and their setting. Developers should ensure that in drawing up proposals, a detailed statement of significance accompanies relevant applications and it can be demonstrated the proposal has taken full account of it. In determining applications, significant weight will be given to the desirability of sustaining and enhancing the significance of the heritage asset, the positive contribution that conservation of the heritage asset can make to the town of Cranbrook and the desirability of development to make a positive contribution to local character and distinctiveness.
- 4.9 In drawing these aspects together in a coherent manner it is recognised that they can be packaged within the Building for Life 12 document which recognises key components that aim to achieve a successful integrated distinctive and sustainable development. Importantly Building for Life 12 (BfL12) comprises 12 easy to understand questions that are designed to be used as a way of structuring discussions about a proposed development. There are four questions in each of the three chapters:
1. Integrating into the neighbourhood
 2. Creating a place
 3. Street and home
- 4.10 These chapters and the themes set out within each allow for a meaningful way of framing expected criteria for the proposed development. Adapted within the Policy CB16, they capture the expected criteria for the expansion areas and any additional infill development – both of which must work together to maximise the benefits that can be achieved for a new town. Importantly the criteria link into many aspects that have health at the heart of their

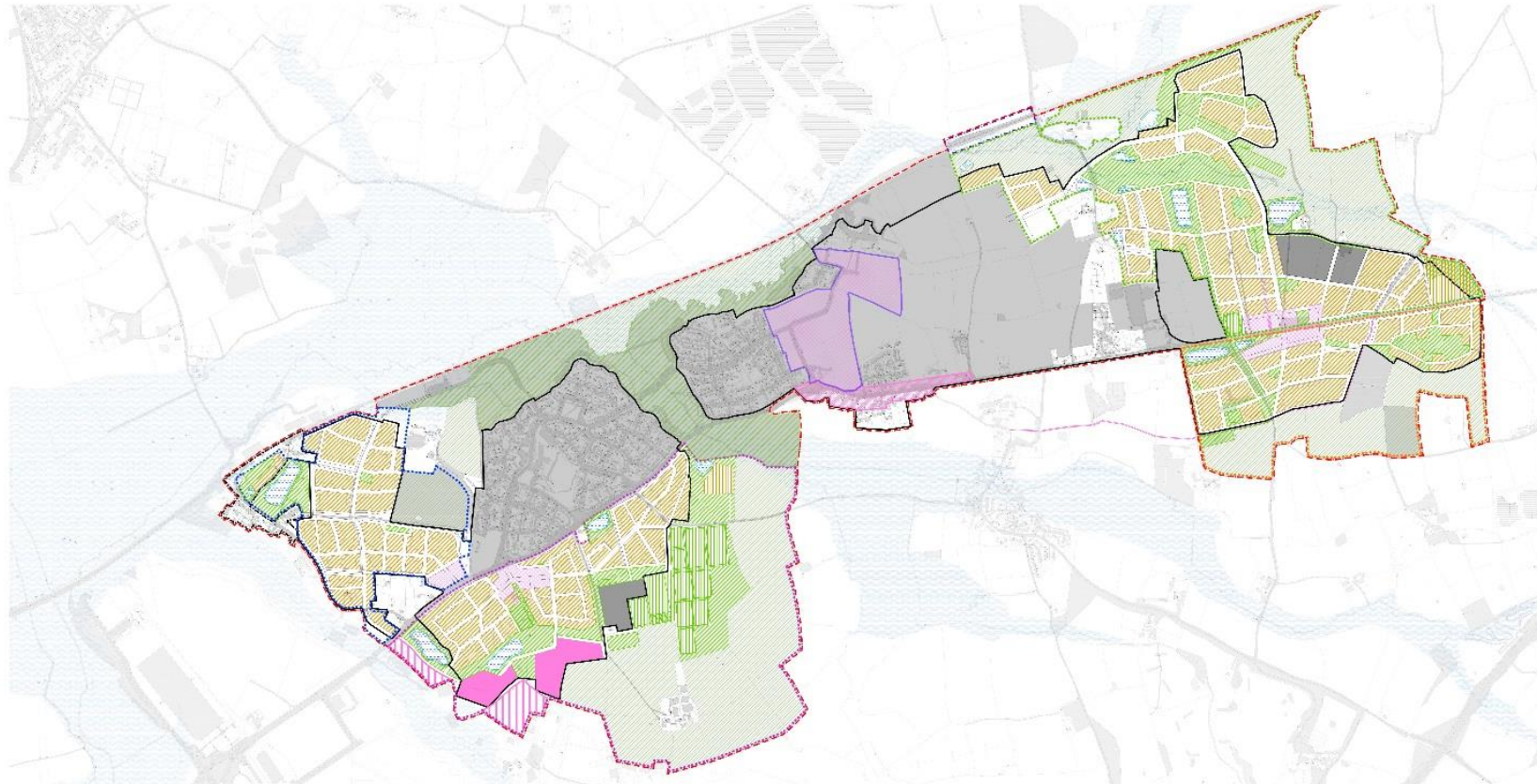
agenda, ensuring that the town is accessible to all, including those with disabilities and health conditions such as dementia which can affect a person's ability to navigate the built environment. In so doing this further strengthens the links between the development and the Healthy New Town status that the settlement currently enjoys.

- 4.11 Development at Cranbrook to date has focussed around delivering modestly sized family accommodation with limited provision of alternative housing types. Whilst this has met the prevailing market demands of the town, in order to develop a truly balanced community and meet the needs of the future and emerging population, a wider range of accommodation must be provided. This includes apartment accommodation in the town centre as well as larger, more aspirational property throughout.



Figure 7 – Grade II listed Treasebeare Farmhouse, located to the south of Cranbrook is a key heritage asset that lies adjacent to the safeguarded land for SANGS.

Cranbrook Plan - Master Plan



Key

Strategic policies

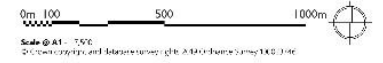
- C50 Bluebird expansion Area including SANC'S
- C51 Incubator expansion Area including SANC'S
- C52 Existing Residential Area including SANC'S
- C53 Single Family Residential including SANC'S
- C54 Neighbourhood
- C55 C56 Corporate/Industrial
- C57 Employment/Industrial
- C58 C59 Light Industrial
- C64 Industrial/Manufacturing
- C70 R. B. Up Area Neighbourhood
- C83 Full Municipal Neighbourhood
- C76 C77 C78 C79 C80 C81 C82 C83 C84 C85 C86 C87 C88 C89 C90 C91 C92 C93 C94 C95 C96 C97 C98 C99 C100 C101 C102 C103 C104 C105 C106 C107 C108 C109 C110 C111 C112 C113 C114 C115 C116 C117 C118 C119 C120 C121 C122 C123 C124 C125 C126 C127 C128 C129 C130 C131 C132 C133 C134 C135 C136 C137 C138 C139 C140 C141 C142 C143 C144 C145 C146 C147 C148 C149 C150 C151 C152 C153 C154 C155 C156 C157 C158 C159 C160 C161 C162 C163 C164 C165 C166 C167 C168 C169 C170 C171 C172 C173 C174 C175 C176 C177 C178 C179 C180 C181 C182 C183 C184 C185 C186 C187 C188 C189 C190 C191 C192 C193 C194 C195 C196 C197 C198 C199 C200 C201 C202 C203 C204 C205 C206 C207 C208 C209 C210 C211 C212 C213 C214 C215 C216 C217 C218 C219 C220 C221 C222 C223 C224 C225 C226 C227 C228 C229 C230 C231 C232 C233 C234 C235 C236 C237 C238 C239 C240 C241 C242 C243 C244 C245 C246 C247 C248 C249 C250 C251 C252 C253 C254 C255 C256 C257 C258 C259 C260 C261 C262 C263 C264 C265 C266 C267 C268 C269 C270 C271 C272 C273 C274 C275 C276 C277 C278 C279 C280 C281 C282 C283 C284 C285 C286 C287 C288 C289 C290 C291 C292 C293 C294 C295 C296 C297 C298 C299 C300 C301 C302 C303 C304 C305 C306 C307 C308 C309 C310 C311 C312 C313 C314 C315 C316 C317 C318 C319 C320 C321 C322 C323 C324 C325 C326 C327 C328 C329 C330 C331 C332 C333 C334 C335 C336 C337 C338 C339 C340 C341 C342 C343 C344 C345 C346 C347 C348 C349 C350 C351 C352 C353 C354 C355 C356 C357 C358 C359 C360 C361 C362 C363 C364 C365 C366 C367 C368 C369 C370 C371 C372 C373 C374 C375 C376 C377 C378 C379 C380 C381 C382 C383 C384 C385 C386 C387 C388 C389 C390 C391 C392 C393 C394 C395 C396 C397 C398 C399 C400 C401 C402 C403 C404 C405 C406 C407 C408 C409 C410 C411 C412 C413 C414 C415 C416 C417 C418 C419 C420 C421 C422 C423 C424 C425 C426 C427 C428 C429 C430 C431 C432 C433 C434 C435 C436 C437 C438 C439 C440 C441 C442 C443 C444 C445 C446 C447 C448 C449 C450 C451 C452 C453 C454 C455 C456 C457 C458 C459 C460 C461 C462 C463 C464 C465 C466 C467 C468 C469 C470 C471 C472 C473 C474 C475 C476 C477 C478 C479 C480 C481 C482 C483 C484 C485 C486 C487 C488 C489 C490 C491 C492 C493 C494 C495 C496 C497 C498 C499 C500 C501 C502 C503 C504 C505 C506 C507 C508 C509 C510 C511 C512 C513 C514 C515 C516 C517 C518 C519 C520 C521 C522 C523 C524 C525 C526 C527 C528 C529 C530 C531 C532 C533 C534 C535 C536 C537 C538 C539 C540 C541 C542 C543 C544 C545 C546 C547 C548 C549 C550 C551 C552 C553 C554 C555 C556 C557 C558 C559 C560 C561 C562 C563 C564 C565 C566 C567 C568 C569 C570 C571 C572 C573 C574 C575 C576 C577 C578 C579 C580 C581 C582 C583 C584 C585 C586 C587 C588 C589 C590 C591 C592 C593 C594 C595 C596 C597 C598 C599 C600 C601 C602 C603 C604 C605 C606 C607 C608 C609 C610 C611 C612 C613 C614 C615 C616 C617 C618 C619 C620 C621 C622 C623 C624 C625 C626 C627 C628 C629 C630 C631 C632 C633 C634 C635 C636 C637 C638 C639 C640 C641 C642 C643 C644 C645 C646 C647 C648 C649 C650 C651 C652 C653 C654 C655 C656 C657 C658 C659 C660 C661 C662 C663 C664 C665 C666 C667 C668 C669 C670 C671 C672 C673 C674 C675 C676 C677 C678 C679 C680 C681 C682 C683 C684 C685 C686 C687 C688 C689 C690 C691 C692 C693 C694 C695 C696 C697 C698 C699 C700 C701 C702 C703 C704 C705 C706 C707 C708 C709 C710 C711 C712 C713 C714 C715 C716 C717 C718 C719 C720 C721 C722 C723 C724 C725 C726 C727 C728 C729 C730 C731 C732 C733 C734 C735 C736 C737 C738 C739 C740 C741 C742 C743 C744 C745 C746 C747 C748 C749 C750 C751 C752 C753 C754 C755 C756 C757 C758 C759 C760 C761 C762 C763 C764 C765 C766 C767 C768 C769 C770 C771 C772 C773 C774 C775 C776 C777 C778 C779 C780 C781 C782 C783 C784 C785 C786 C787 C788 C789 C790 C791 C792 C793 C794 C795 C796 C797 C798 C799 C800 C801 C802 C803 C804 C805 C806 C807 C808 C809 C810 C811 C812 C813 C814 C815 C816 C817 C818 C819 C820 C821 C822 C823 C824 C825 C826 C827 C828 C829 C830 C831 C832 C833 C834 C835 C836 C837 C838 C839 C840 C841 C842 C843 C844 C845 C846 C847 C848 C849 C850 C851 C852 C853 C854 C855 C856 C857 C858 C859 C860 C861 C862 C863 C864 C865 C866 C867 C868 C869 C870 C871 C872 C873 C874 C875 C876 C877 C878 C879 C880 C881 C882 C883 C884 C885 C886 C887 C888 C889 C890 C891 C892 C893 C894 C895 C896 C897 C898 C899 C900 C901 C902 C903 C904 C905 C906 C907 C908 C909 C910 C911 C912 C913 C914 C915 C916 C917 C918 C919 C920 C921 C922 C923 C924 C925 C926 C927 C928 C929 C930 C931 C932 C933 C934 C935 C936 C937 C938 C939 C940 C941 C942 C943 C944 C945 C946 C947 C948 C949 C950 C951 C952 C953 C954 C955 C956 C957 C958 C959 C960 C961 C962 C963 C964 C965 C966 C967 C968 C969 C970 C971 C972 C973 C974 C975 C976 C977 C978 C979 C980 C981 C982 C983 C984 C985 C986 C987 C988 C989 C990 C991 C992 C993 C994 C995 C996 C997 C998 C999 C1000
- Sullivan Alternative Rural of Green Space (SARIS)

Non-strategic policies

- C101 Limited Town Centre
- Mixed residential and commercial development in town centre (existing residential core)
- C102 Limited town centre and parkway

For information

- Road zone
- Existing Cranbrook outline permission
- Cranbrook Plan area
- Cranbrook Core Policy



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Figure 8 – Cranbrook Masterplan

CB17. Amenity of Future Occupiers

CB17 Amenity of future Occupiers

Development will only be permitted where:

1. New dwellings provide accommodation that meets with the Nationally Described Space Standards. The layout of new dwellings should be designed to meet the needs of occupants by ensuring circulation routes are legible and storage is provided on all floors of accommodation;
2. It provides for a high standard of amenity, satisfactory living and working conditions, adequate protection from noise and pollution and adequate levels of light and outlook for future occupiers, including having taken account of solar gain;
3. It makes provision for external private or communal amenity space which is appropriate and integral to the dwelling/s it serves having regard to the size of the property and its orientation;
4. Such standards as above can be achieved and maintained without preventing or unreasonably restricting the continued operation of established authorised uses and activities on adjacent sites.

- 4.12 Local authorities are required to deliver a wide choice of high quality homes, taking into account current and future demographic trends, for example the needs of people with disabilities. In order to do so, Local Authorities need to consider the size of housing required, which include the internal space within a dwelling, and the accessibility and adaptability.

Nationally Described Space Standards

- 4.13 On 27 March 2015 the Government announced a new approach to the setting of technical housing standards in England. This was accompanied by the publication of a new set of streamlined national technical standards, known as the Nationally Described Space Standards²⁸ which came into effect on the 1st October 2015.
- 4.14 The standards are one part of a wider housing standards review package which the government announced in a Ministerial Statement, setting out that new homes need to be

²⁸ Department for Communities and Local Government (2015) Technical housing standards – nationally described space standard and can be accessed using the following link: [technical housing standard - NDSS](#)

high quality, accessible and sustainable. Though not mandatory, Government expect that these standards will replace existing locally-produced standards and local authorities can require compliance with the standards within Local Plan policies.

- 4.15 The Government's approach for setting technical standards for housing aims to rationalise existing standards, providing a simple system to help bring forward more new homes. The nationally described space standards are to complement the existing set of Building Regulations. In interpreting and applying these standards it will be considered that every habitable room which does not function as the main living room, dining room or kitchen will be regarded as a bedroom.
- 4.16 The quality of one's home is a determining factor in health outcomes and the need for accommodation which is of a suitable size and layout to meet the needs of the occupier/s is key to this.

CB18. Digital Connectivity

CB18 Digital Connectivity

All developments proposing new dwellings or employment space must ensure fixed and mobile gigabit-capable digital connectivity is provided throughout.

In order to ensure this, digital connectivity should be considered early on in the planning of the site as part of a comprehensive utility network plan, and the relevant technology and approach taken should be set out in a Digital Connectivity Statement accompanying any planning application, clearly identifying how the Digital Infrastructure Objectives are being achieved.

Until such point as further guidance is produced, the 'minimum' expectation is that ducting with capacity for more than one provider to lay sub ducting and/or fibre optic cable will be provided to enable delivery of multi-operator Fibre to the Premises and sufficient mobile connectivity. Applicants are encouraged to go beyond the minimum requirements wherever possible.

- 4.17 Digital connectivity has been firmly established as the fourth utility. Access to high speed, reliable broadband and mobile connectivity is imperative to the economic success of the area. Digital connectivity is also key to residential development. Domestic broadband usage continues to grow exponentially and home working and remote service access is increasingly necessary as standard. Cranbrook has led this standard, establishing a principle of Fibre to the Premises to all properties from day 1. Continuing to enable these is expected to reduce the need to travel (reducing the carbon emissions and congestion on roads) and can provide work-life balance and social benefits (improving the health and wellbeing of the population and productivity of the workforce). A high speed, stable, uncontended²⁹ internet connection is essential to enable these benefits.
- 4.18 The NPPF requires planning policies to support expansion of electronic communications networks, set out how high quality digital infrastructure is expected to be delivered, and prioritise full fibre connections. This is informed by wider Government policy which focuses on the need to deliver gigabit-capable³⁰ fixed line (broadband) and mobile connectivity, with an acceptance that this is inherently dependent on the roll-out of full-fibre networks. Allied to this is the aim to promote and accelerate investment in such networks by multiple providers so as to stimulate competition. On this basis Policy CB18 is underpinned by twin Digital Infrastructure Objectives to:

²⁹ Contention is the sharing of a broadband signal by a group of customers which results in reduction of the bandwidth available to each individual customer.

³⁰ "Gigabit-capable" refers to technology/infrastructure that is capable of accommodating speeds of >1Gbps.

1. reduce barriers (practical and financial) to the installation of, and access to, the most advanced digital connectivity technologies that are reasonably possible for providers and users (at present, gigabit-capable services); and
 2. support consumer choice and effective market competition by requiring ducting sufficient to allow more than one provider to service a development
- 4.19 Many new buildings and developments are not truly 'fibre-ready' as they do not include fibre ducting across the site and appropriate fibre accommodating infrastructure within buildings. This means costly retrofitting works. Ensuring new buildings and developments have suitable duct and riser space designed-in and built-in from the start, removes unnecessary cost and delay to the telecoms industry, thereby stimulating market competition and enabling gigabit-capable fibre to the premises connectivity.
- 4.20 The role of planning policy in requiring digital connectivity infrastructure relates only to high level components such as ducting, sub-ducting and access chambers. At the time of writing, the 'minimum' expectation is that ducting with capacity for more than one provider to lay sub ducting and/or fibre will be provided in all new build developments.
- 4.21 Policy CB18 refers to future guidance which will likely take the form of a Supplementary Planning Document (SPD). The SPD will set out the detail of how new developments should respond to the need for digital connectivity infrastructure and provide practical guidance for how the policy objectives can be considered and delivered upon through the development management process. As a minimum, new developments will be expected to provide the appropriate level of on-site infrastructure necessary to enable these objectives, and to make reasonable financial contributions to the delivery of necessary off-site infrastructure to contribute to the connectivity levels of the wider area. This high level, flexible approach is considered appropriate for futureproofing policy in relation to fast-changing technology.
- 4.22 Requiring the submission of a Digital Connectivity Statement and inclusion of digital connectivity within a comprehensive utility network plan, compels applicants to consider digital connectivity from the outset. This should enable fibre optic ducting to be installed alongside other utilities and services at the design and build stage, simplifying the process, reducing the costs and increasing the likelihood of service provision upon completion. Taking this approach should lead to a "dig once" approach to utilities provision. Installing ducting alongside installation of other utilities is much lower cost than installing ducting on its own as the dig costs and inspection chambers can then be shared. Ducting delivered as part of development should be passed on to an independent trust, co-operative or Management Company once completed, to ensure its open availability in perpetuity.
- 4.23 Compliance with this policy will be secured through the use of planning conditions.

CB19. Coordinated sustainable travel

CB19 Coordinated sustainable travel

Coordinated accessible and alternative means of transport which help deliver the sustainability and health related benefits that are fundamental to this plan shall be made available for future residents and employees living and working in the town. These shall be delivered through the use of the following two approaches and secured for all major planning applications for new developments at Cranbrook:

Travel Plan

The Travel plan shall seek to deliver sustainable transport objectives and ensure that residents and employees are made aware of the options available to them for sustainable travel, the benefits and costs of these and how they can be accessed. It shall be regularly reviewed and as part of its development could include either a traditional “new occupiers/employee pack” or the development of an up to date electronic travel app;

Shared Cars and Electric Bicycles

Vehicles and parking/docking spaces for shared cars and shared/rented electric bicycles shall be provided throughout Cranbrook to support multi-modal travel. In each of the following identified locations, provision shall be made, at a minimum ratio of 1 shared car or 5 bicycle docking stations and electric bicycles per 400 dwellings or per 200 employees (calculated according to specific development type):

- Each of the mixed-use areas and/or neighbourhood centres identified in the four expansion areas under policies CB2 – CB5 inclusive;
- In the Town Centre; and
- In the employment allocation in the Treasbeare expansion area.

Facilities shall be delivered in each of the areas identified (at the ratios set out) by the respective developments.

Provision shall also be made at the railway station(s) such that each station provides for 1 additional shared car club vehicle and an additional two dedicated shared car club parking spaces, and 3 electric bicycles and 8 associated docking stations – these to be delivered as part of the shared infrastructure required by Policy CB6.

As part of facilitating and encouraging sustainable travel by employees, new employment generating development must include the provision of washing and changing facilities for staff.

- 4.24 Properly coordinated sustainable travel is an approach through which alternative means of movement can bring significant long term benefits to society, the environment and the economy. It is a mechanism through which users can be reassured that many of their journeys can still be made reliably, safely and conveniently while providing significant health and environmental benefits.
- 4.25 For new residential development such measures have traditionally been provided through new home starter packs and included such benefits as short term bus passes, cycle purchase vouchers and a series of local transport timetables – all overseen by a transport coordinator. This model still works but in an age when so much communication is online and having regard to the young demographic of Cranbrook, the ability to engage and possibly incentivise new occupiers through the use of a dedicated app should be explored. Such an app could act not just to signpost to different modes of public and shared transport but provide information about local community groups, activities and services in an effort to encourage the New Model of Healthy Living which has been instigated through the Healthy New Towns programme and whose legacy will continue with the Sport England Local Delivery Pilot. Either way, measures that provide for a reduction in the need to travel; the encouragement of walking and cycling, and the promotion/encouraged use of public transport or responsible car use must be adopted.
- 4.26 An important component of this is that of car sharing. Car sharing clubs in the UK started in 1998 in Leeds and Edinburgh with schemes inspired by examples in Switzerland and Germany. Since then data from Carplus (published by the University of the West of England)³¹ has set out that there were around 32,000 members of car sharing schemes (car clubs) in 2007 in the UK and by 2010 the figure had risen to 146,000 members. By the end of 2015 there were 206,650 members and 3,600 vehicles operated in UK.
- 4.27 Car clubs are not only growing in popularity and availability as evidenced by the above figures but are playing a significant role in reducing traffic impacts, reducing parking pressure and helping to encourage a modal shift and result from either a reduction in the physical numbers of cars or a reduction in car use.
- 4.28 Importantly for Cranbrook and associated with the reduction in car use/modal shift, car sharing clubs are linked with an increase in the use public transport, walking and cycling. For a Healthy New Town such outcomes are necessarily of significance. Within the University of the West of England report it is set out that “train travel amongst car club members is more than double the averages across the UK, with bus use around a third higher than average. Car club members are also around three times more likely than the average person across the UK to be a regular cyclist”. Cranbrook currently has one car club vehicle located at the neighbourhood centre on Younghayes Road.

³¹ Melia, S. and Parkhurst, G. and Carplus Trust (2016) Car clubs in new developments. Project Report. can be accessed using the following link: [Project Report](#)

- 4.29 Building on this recognition, car clubs are now beginning to broaden their function so that they become part of a wider suite of movement options that include public transport, walking, cycling and cycle sharing schemes. In recognising this direction and in noting the potential at Cranbrook with its own town centre, railway station and employment provision it is considered reasonable to secure provision in key nodes around the town of both car sharing and cycle sharing infrastructure and facilities. Such a network would strengthen that which is already available and allow better connected and better coordinated transport. Fundamentally a fully operational network would allow connected trips such that people could for instance travel to Cranbrook by train, use a bicycle from the hub adjacent to the station to reach an office and then return it to the train station before catching the train home.
- 4.30 Compliance with this policy will be secured through the use of S106 agreements.



Figure 9 - Existing car club vehicle at Cranbrook. The vehicle has a dedicated parking spaces located opposite the Younghayes Centre community centre, in a central location.

CB20. Plug-In and ultra-low emission vehicle charging

CB20 Plug-In and ultra-low Emission vehicle charging

To help reduce the carbon levels associated with transportation, it is important that the role of plug in and ultra-low emission vehicle charging is further expanded. To achieve this within the Cranbrook plan, focus is given to the development of an Electric Vehicle (EV) charging network which shall be delivered in accordance with the following requirements:

- | | |
|---|---|
| 1. Residential development with on plot parking | a) Each property must have either:
provision of dedicated electric vehicle charging point; or
b) be “EV ready” through the installation of a ducted circuit to an easily accessible position within the plot to allow vehicle charging. |
| 2. Residential development with off street parking (but not where this is located on plot) | Infrastructure comprising:
a) the installation of dedicated EV charging points to at least one parking space per dwelling or
b) “EV ready” spaces – that is where a ducted circuit extends to at least one parking space for each dwelling |
| 3. On-street/adjacent to street parking | Infrastructure to ensure that not less than 20% of on street car parking spaces has the potential to access EV charging facilities through the installation of a ducted circuit to each potential charging point. |
| 4. Commercial development within the allocated employment area; town centre and mixed use areas | Infrastructure to ensure that not less than 15% of parking spaces are provided with EV Charging points.

A further 35% of parking spaces are to be provided as “EV ready” spaces through the installation of a ducted circuit to each potential charging point.

In addition and within the commercial development areas, opportunities to deliver rapid charging hubs must also be maximised |

EV charging circuits/points required by this policy must be connected to a three phase electricity grid connection

Where EV charging points are provided, suitable arrangements for ownership, management and maintenance of the EV charging and parking infrastructure must be demonstrated.

Infrastructure for EV charging facilities required under points 3 and 4 above shall be distributed throughout the development to ensure that they serve every group of up to 5 spaces.

- 4.31 The use of electric vehicles is a key measure in reducing emissions locally and therefore the provision of infrastructure to facilitate and stimulate this change is essential. An increase in the uptake of plug in vehicles is also growing significantly and therefore it is important that the development recognises and responds to this change.
- 4.32 Information published by the Department for Transport has shown that within the last three years, recorded numbers of electric and other hybrid style vehicles has grown significantly and reinforces the recognition that this is an area where significant provision needs to be made.

Cars first registered by propulsion / fuel type	Petrol	Diesel	Non Plug in Hybrid electric	Plug In Hybrid electric	Electric	Extended Range Electric	Fuel Cells	Gas
2017 (%)	53.5	41.7	2.6	1.5	0.6	0.1	-	-
2017 (total) (1000's)	1342.2	1047.4	65.9	37.3	13.9	2.5	-	-
2014 (%)	48.1	49.8	1.5	0.3	0.3	0.1	-	-
2014 (total) (1000's)	1173.7	1213.7	36.3	6.6	6.7	1.3	-	-

Source: Vehicle Licensing Statistics Table VEH0253 Cars registered for the first time by propulsion / fuel type for United Kingdom

- 4.33 In addition such organisations as the National Grid are planning for a significant extra burden on their network as a result of the uptake of electric vehicles and have tested four different models - two of which, based on a prosperous economy and strong sustainable credentials, consider that by 2033 and 2042 (depending on which model is employed) 50% of all the cars on the road would be electric. This underlines the significance of planning for such a change now and not simply relying on retrofitting towns and cities in the future
- 4.34 Electricity grid connections for electric vehicles at Cranbrook should be “three phase” to enable greater capacity, flexibility and two-way flows in order to support smart energy management and Vehicle to Grid flows.

- 4.35 Such issues are also identified within the recently published government publication “The Road to Zero: Next steps towards cleaner road transport and delivering our Industrial Strategy” (2018)³². This identifies that significant growth in the industry is occurring although “consumer acceptance” remains one of the key challenges. As a result it recognises that there are a number of steps that need to be taken to support the development of a “fit for purpose” infrastructure network.
- 4.36 Whilst a strong network of public charge points is likely to be important, the government currently anticipates that the vast majority of drivers will choose to charge at home where this is possible. Electric vehicles offer consumers a more convenient and cost-effective way to refuel, with domestic charging playing a crucial role (some studies indicate this accounts for the vast majority of electric vehicle charging). It is expected that as electric vehicles become increasingly popular, charging at home overnight, or at workplaces, will continue to be the most attractive options and therefore the policy tries to reflect the importance of this component. Balanced against this however is also a growing recognition that to deliver the speed of charging rates, specialist facilities are required. These are most easily and efficiently located in hubs in a similar fashion to current fuel filling stations.
- 4.37 Importantly “The Road to Zero” strategy document highlights that electric vehicle drivers need to be able to easily locate and access electric vehicle charging infrastructure that is affordable, efficient and reliable. A small but growing aspect of charging point delivery lies in the availability of installing charging facilities in street furniture – most easily alongside or as part of lamp posts. While at the time of writing there remain issues of maintenance and management for such installation it is a potentially important route to further strengthening the network – particularly where some residential car parking is likely to take place on street in line with policies elsewhere in this Plan. In this regard having lamp columns fitted with ducting and cabling to allow such a facility is justified and will help to future proof the town.
- 4.38 To ensure that the expanded town of Cranbrook has adequate facilities to serve this growing demand, future occupiers need to have appropriate access to appropriate charging points, either in the form of points at domestic property, and in commercial situations or through centralised hubs – it is considered that a combination of both is likely to achieve the greatest level of carbon reduction as it provides for a robust and accessible network of charging points. This means that in accordance with commitments contained within the Road to Zero publication the requirements of the policy as set out above represent a reasonable approach that balances the likely future need with the ability to make evolving electric vehicle charging technology available.
- 4.39 The standards set out acknowledge that innovation and technology will continue to develop and battery sizes will get increasingly larger to meet the demand for longer range electric vehicles. Recently the price of charging units has fallen, increasing the financial viability of

³² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf

fast 7kW chargers in residential and retail developments, but the option for one or more hubs providing rapid charging facilities also need to be strongly encouraged.

- 4.40 Based on likely car ownership rates remaining the same, average charging times of 15mins (equating to 3.5 cars being serviced every hour and allowing for change over time), it is considered that if 40% of cars within the expansion area are electric by the end of the plan period (thereby providing for an additional 4000 homes and as such a total of 2720 electric cars to be fully charged on a weekly basis) a minimum of 10 such rapid charging points would be required. This provision should be secured through the policy as an alternative to having a high percentage of charging points within the domestic and commercial areas.



Figure 10 – existing EV charging at Cranberry Farm, Cranbrook

CB21. Parking at Cranbrook

CB21 Parking at Cranbrook

Car Parking Standards and Design

New residential developments at Cranbrook will be required to provide parking provision to an average of not less than 1.7 car parking spaces per dwelling (rounded up to the nearest whole number in individual applications).

Within the overall requirement of 1.7 parking spaces per dwelling, not less than 30% of parking spaces in a residential development parcel shall be provided in parking bays adjacent to adoptable streets as unallocated parking.

Car parking spaces must be of an adequate size to accommodate vehicle parking and have sufficient width to the sides for pedestrian access and egress of vehicles taking account of the location of the parking space, whether or not spaces also serve as access to a property and adjacent obstructions.

Garage spaces will not count toward the overall quantum of car parking spaces but where provided each single garage space must have a minimum internal clear width of 3300mm and length of 6000mm.

All parking spaces shall be provided such that they are designed and laid out to both facilitate easy use and integrated with the street scene to ensure attractive and functioning streets.

Parking to the rear of a dwelling or in parking courts will only be considered once options to provide on or off-street parking to the front or side of a dwelling have been exhausted.

The only exceptions to the required minimum standard will apply where it is demonstrated that adequate off-site parking spaces currently exists and will exist in the future to meet needs.

Non-residential development must demonstrate that sufficient car parking provision is made to support the proposed development. This must include parking provision for disabled persons.

Bicycle Parking Standards

Bicycle parking must be provided in all future developments at Cranbrook so that it is:

1. Conveniently sited to the property or use it serves;

2. Accessible and easy to use;
3. Safe and secure; and
4. Covered.

All new residential dwellings at Cranbrook, unless explicitly designed to accommodate residents that would not be able to ride a bicycle, will need to include safe, secure and undercover space specifically designed, or readily useable, for bicycle storage at a ratio of 1 bicycle storage space per bedroom. Where garages are provided, these will count as the bicycle storage space for the respective dwelling.

All destinations that will attract regular visitors, including the town centre and facilities within it and employment facilities, will need to have dedicated safe, secure and covered cycle parking provision of a scale appropriate to the use and location.

- 4.41 Provision of car parking at Cranbrook to date, including on-street parking and parking in private parking spaces, is a matter which to date has proven an important topic for residents and levels of success in layout are varied across the town. This highlights the necessity to ensure that future development at Cranbrook delivers parking provision of a standard which is suitable both for the current and future needs of residents.
- 4.42 To ensure future development is supported by parking that is adequate and appropriate to meet user needs all future parking will be required to meet minimal space standards, to be set out in a supplementary planning document or guidance from Devon County Council (as is the present situation) in order to allow for regular review. Such a document could also further prescribe how the average provision of car parking spaces is to be apportioned between housing of differing size and type.
- 4.43 At Cranbrook, garages have often been provided of a size which would not easily fit a modern car, which lowers the likelihood of use for parking. Furthermore and on a wider scale than Cranbrook, even where garages are of a more adequate size, they are often used for storage purposes, thereby eliminating the potential for parking use. In order to ensure that adequate parking provision is made, it is therefore appropriate to discount garages when calculating the level of parking in a development. However, in recognising their use for secure and dry storage, where provided they will count as a dwelling's bicycle storage facility.
- 4.44 The 2016 Cranbrook Community Questionnaire indicated average vehicle ownership of 1.55 vehicles per household. The survey did not distinguish ownership levels between differing dwelling sizes and was based on a relatively small sample of 273 respondents. Nevertheless the age profile of respondents broadly aligns with the age profile of the population of the town, indicating a good overall sample. The average car and van ownership figure per household is not dramatically different than the 2011 census data for Broadclyst Parish (within which Cranbrook presently lies) of 1.62 vehicles per household and is higher than the East Devon and Exeter averages. Allowance for visitors parking spaces is included in the policy requirement.

- 4.45 In order to ensure that car parking is delivered in locations which best support the street scene and to encourage use, the policy looks to require a percentage of parking spaces are provided adjacent to the street and in unallocated bays and that priority is given to spaces to the front or side of properties, where use is more likely. The policy is not intended to require that the remaining parking spaces are all allocated to specific properties and indeed, further unallocated spaces will serve to allow for deviation in vehicle numbers per dwelling. This strategy will also enable greater flexibility in how residential plots are delivered and scope for the level of parking provision to be adapted to suit the type, mix and use of development.
- 4.46 The overall approach to parking provision allows for a future where car ownership levels may lower, as is beginning to be seen in some towns and cities across the UK. Therefore, whilst the policy seeks to ensure that adequate parking provision is made to meet the current needs of the town, as opportunities for alternative sustainable means of travel increase (as a result of improved public transport, more local job opportunities etc.), these parking spaces could be put to alternative use (e.g. turned into additional garden space on-plot or used for shared or autonomous vehicles)

CB22. Cranbrook Town Centre

CB22 Cranbrook Town Centre

The policies map sets out the boundaries of the Cranbrook Town Centre where the heart of the economic, social, cultural and civic activities that support the wider town will take place.

As a Healthy New Town, which is self-supporting and capable of meeting most of its own retail, commercial, economic and social needs, it is essential that the area is vibrant. Through good layout, physical design and the range of uses and activities available (including the delivery of residential units on upper floors), the Town Centre must draw people into a place where they can meet, take part in the activities and resources available or simply sit and watch the world go by.

To achieve this, the town centre should be focussed around a market square which is a multi-functional space used for cultural purposes, recreation, and outside/market trading and frontage development which addresses both the square and the roads/access routes leading to it.

The town square will be designed as a multi-functional space to accommodate the following as a minimum:

1. Ability to host markets and events; and
2. Seating and social space to encourage activity; and
3. High quality public realm which supports the function of the town centre.

Within the town centre provision shall also be made for and ensure that the following uses are appropriately located (some of which can be co-located) to ensure good connectivity and legibility through the area:

- A Health and Wellbeing hub
- Leisure centre
- Civic centre (Town Council Offices)
- Library
- Children's centre
- Youth centre
- Extra Care housing

In addition proposals which come forward and are located within the Town Centre as defined on the policies map, for both retail and non-retail uses (with particular encouragement being given to uses falling within Classes A1, A2 and A3 of the Town and Country Planning (Use Classes Order) 1987 (as amended)) will be permitted provided that:

- a) It can be demonstrated that the proposal delivers variety and encourages people into the area
- b) The use would not undermine the visual amenity, vitality or viability of the town centre which should be a place focussed on people and their engagement with commercial, social and cultural activities
- c) The amenity interest of occupiers of adjoining properties is not adversely affected by reason of noise, smell or litter
- d) It would not cause an unacceptable impact on highway safety, and the residual cumulative impacts on the road network would not be severe
- e) Permission for subsequent changes of use will be subject to the same tests outlined above

For the avoidance of doubt, the establishment of new retail facilities which are outside of the defined town centre and are not proposed in any one of the three neighbourhood centres identified and secured within Policies CB3-5 or along the London Road and solely in accordance with Policy CB24 (London Road Commercial and Retail proposals) will not be permitted if they would harm the convenience, vitality or viability of the town centre or lead to a dispersal of activity.

Floor space for A use classes will only be permitted where no more than 1 unit of A5 (Hot food takeaway) use class is proposed for every 3 units of other A use classes within the Town Centre boundary. This will be a cumulative calculation, taking into account any existing premises.

Temporary uses

It is recognised that the town centre will take time to develop as a result of the need for critical numbers within its catchment and the commercial realities of delivering a brand new 21st Century town centre.

To support the delivery of the town centre and encourage the emergence of a focus for commercial, retail, cultural and social activity taking place, proposals for temporary uses will be encouraged.

Such development would need to demonstrate that it can contribute to the future vitality and viability of the town centre and be laid out so that it does not prejudice the future delivery of permanent development including the delivery of the market square. In addition the buildings/structures used to accommodate such uses together with their setting, must be of a high quality finish to ensure that a successful attractive and welcoming environment for the emergent town centre is achieved.

Permissions granted under this option will be made temporary and their time period for retention restricted to help facilitate permanent town centre development.

Cranbrook's vision is to become a lively, enterprising town with a strong entrepreneurial identity, building its own business base and business links with surrounding employment developments.

- 4.47 One of the main focuses for the town is to build a strong economy which also creates a strong sense of place, the emphasis is on supporting small and micro businesses, including social and community enterprises. The approach of providing a 'business ladder' of tailored space and support has the potential to accommodate cultural and creative businesses well.
- 4.48 Whilst an existing planning permission exists for town centre development at Cranbrook many of the assumptions that informed the permission are now somewhat dated and increasingly unlikely to be realised in a changing environment for town centres and tough retail conditions. It is appropriate, therefore, to refresh the vision and policy for the town centre to respond to evolving and changing needs and pressures for development and to build flexibility into the plan.
- 4.49 Land is allocated in the Cranbrook Plan for the development of a vibrant and successful town centre which is seen as critical for the future success of Cranbrook. The Cranbrook policies map identifies the extent of the town centre.
- 4.50 The new town square should be of a size reflective of the size of a town of 20,000 people and be designed and laid out to provide flexibility in its use. For example, floor boxes for power and lighting should be provided within the square in order to facilitate markets and outdoor performances.

Exeter and East Devon Enterprise Zone

- 4.51 The town centre of Cranbrook falls within the Exeter and East Devon Enterprise Zone which became operational from the 1 April 2017. The designation enables businesses to apply for business rate relief which would apply until 31st March 2022. There is also the potential for Cranbrook Town Centre to benefit from having a simplified planning regime through the use of a Local Development Order.

Cranbrook Town Centre Vision

- 4.52 East Devon District Council's vision for Cranbrook Town Centre is:

An enterprising, vibrant, innovative, exciting, and sustainable town centre that develops a strong economic and cultural identity

that comes from, brings together and supports the community of Cranbrook.

4.53 This vision holds a number of clues about what is needed.

1. **Enterprising** means that there must be space to support businesses to start up, succeed and grow. This suggests reduced risks, including capital costs and overheads.
2. **Vibrant** means that there needs to be space for a large number of different activities and organisations. It means that there needs to be a range of types and sizes of available spaces, both internal and external, that businesses, other organisations and the community can occupy.
3. **Innovative** means that there will need to be unique responses to the particular issues that need to be addressed at Cranbrook.
4. **Exciting** means events, novelty and change. This is what people are drawn to and what they find exciting. Having a town centre that enables events to happen, and enables change to occur, especially in its formative stages, is important to its success.
5. **Sustainable** means that economic, cultural and social activity must be able to survive and thrive. This depends on diversity and the ability to change and adapt. Sustainable also means that activity and buildings do not have a negative environmental impact. If there are any unavoidable negative impacts these should be offset within the town centre itself where possible.
6. **A strong economic and cultural identity** means that what happens in the town centre should be unique and recognisable. Buildings, spaces and activities should all reflect this goal.

Temporary uses in Cranbrook Town Centre

4.54 Prior to more expensive and fixed development taking place in the allocated town centre area the use of land for temporary and flexible uses will be encouraged and supported. The town centre of Cranbrook will become a thriving centre that people will want to visit and use. A potential problem is, however, that it may take time to secure the investment needed to allow for permanent 'bricks and mortar' development to take place. Until such development is secured it will be important nonetheless to promote and encourage business, commercial and community activity in the centre and help to establish it as a place that people want to visit and use. Through encouraging positive use of the town centre space it will give people greater confidence to invest in the town centre.

- 4.55 Given the importance of early uses and activity in the town centre, this policy of the plan encourages temporary uses and structures to take place that will encourage commercial and community activity. One such use that has been discussed is an initiative centred around the use of temporary modular units to provide retail, commercial or community spaces. Shipping containers are one option for these units and are cheap to purchase and can be stacked up and if need be, joined together. They can also be clad in other materials or painted to create an attractive but flexible space for a range of uses. With minimal services required they can become effective temporary spaces that can house a range of enterprises, especially new start-up businesses who have low covenant strength.
- 4.56 A modular building can provide temporary and adaptable spaces for small businesses and organisations while simultaneously providing social and cultural space for the community. By using temporary space what it is that the community needs and can sustain can be tested before providing them in more costly and permanent form.

CB23. Residential Development in the Town Centre and Neighbourhood centres

CB23 Residential Development in the Town Centre and Neighbourhood Centres

Residential development, specifically on upper floors above shops and other commercial premises, will be expected in all permanent commercial town centre and neighbourhood developments in Cranbrook as these locations are best positioned to allow future occupiers the easiest access to a range of means of transport, social facilities and employment.

Planning applications for development in such centres will be required to demonstrate:

1. That they deliver residential development and achieve the highest appropriate density, which will be not less than 55-60 dwellings per hectare;
2. Residential development that shall be so designed and located as to ensure that it does not prejudice the vitality and viability of the respective centre;
3. Good levels of amenity for each unit of residential accommodation incorporating naturally lit rooms with views out to the streets, and access to shared and private outdoor space;
4. Proposals which are of high quality design for the character of the area and designed to ensure that future residents are not adversely affected by other uses and activities.

Where it can be demonstrated that land on the periphery of the town centre area is not required for retail, commercial or community uses, some limited high density residential accommodation will be permitted at ground floor level provided that any proposals for such uses demonstrate adaptability of the ground floor of dwellings to allow conversion to units that could be used for business and retail activities in the future if required.

SANGS provision in line with Policy CB15 together with financial contributions for direct enhancement and conservation of the Exe Estuary and Pebblebed Heaths must be provided where new residential development (that is in addition to housing permitted through Cranbrook Phase 1) is proposed to ensure that there are no adverse effects of development on European protected sites

Residential development in the Town Centre will be required to make financial contributions toward outstanding unfunded or not fully funded infrastructure at Cranbrook as detailed in policy CB6.

- 4.57 The town centre of Cranbrook will be a focal point for commercial, retail, business and community uses which will exist in a high quality environment. In addition both the Town Centre and Neighbourhood Centres will form nodes where accessibility to a range of means of transport including shared cars and e-bikes will be greatest. As part of the overall mix of development therefore it is appropriate, to encourage residential development in these areas.
- 4.58 It is common for town and neighbourhood centres to have flats and apartments over shops and commercial spaces, or homes otherwise dispersed amongst commercial and community uses, often 'tucked-away' from commercial frontages. Cranbrook should be no different and the inclusion of residential development in these areas will help bring additional life and vitality into these key areas in the town and is essential in order to provide a resident population.
- 4.59 In addition such an approach is in-line with the requirements of the National Planning Policy Framework (2018) where it requires plans to contain policies which optimise the use of land and "should include the use of minimum density standards for city and town centres and other locations that are well served by public transport" (para. 123). The guidance continues that these standards should seek a "significant uplift" in the average density of residential development within these areas unless there are strong reasons why this would be inappropriate development within these areas unless there are strong reasons why this would be inappropriate.

4.60 In the case of Cranbrook, 40 dwellings per hectare (dph) has often been achieved around the town and therefore a minimum of 55-60dph which is set out in the policy represents a reasonable uplift in development density without being unrealistic or unachievable. Striking such a balance is important but without any significant reasons why, when using appropriate housing typologies the minimum densities could not be met, these are considered achievable.



Figure11 – Neighbourhood Centre shops along Younghayes Road, Phase 1 Cranbrook

CB24. London Road commercial and retail proposals

CB24 London Road Commercial and retail proposals

Proposals for development and changes of use on the London Road frontage in areas identified on the policies map will be supported where they propose retail and other footfall dependent commercial activities (provided that they do not harm the vitality and viability of the Town Centre) and the following criteria are met:

1. They include the provision of an active frontage to encourage passing trade;
2. They will not demonstrably harm residential amenity or privacy;
3. They will not lead to harm from noise, smell or other forms of pollution;
4. Suitable provision is made for access, parking and deliveries.

New residential uses in these areas will only be permitted where they are designed with an active frontage that directly fronts onto the London Road, and where the ground floor is so designed to ensure that it is fully convertible to facilitate future uses for retail or other footfall dependent commercial uses.

Floor space for A use classes will only be permitted where no more than 1 unit of A5 (Hot food takeaway) use class is proposed for every 3 units of other A use classes within the identified London Road frontage on the policies map. This will be a cumulative calculation, taking into account any existing premises.

- 4.61 Research³³ undertaken by Space Syntax on behalf of the Cranbrook Healthy New Towns programme has explored the accessibility of the Cranbrook Town Centre on a local and regional scale. The research indicates that London Road has a higher accessibility than the existing routes within the town centre and are likely to be capable of sustaining footfall dependant town centre uses. In order to maximise the success of the town centre for the benefit of residents of Cranbrook and surrounding communities, it is appropriate to support retail and other footfall dependent commercial activities along part of London Road in the vicinity of the town centre, where there are already a number of businesses operating. Such support for additional commercial uses would need to ensure that they did not harm the amenity or living conditions of retained residential properties.
- 4.62 The London Road (B3174) is an important route providing east-west connectivity as an alternative to the use of the A30 and is well used by traffic. To date Cranbrook has evolved as a town situated north of this important route and the town centre boundary also lies to the

³³ [Insert SS link](#)

north of the London Road. Work commissioned as part of the Healthy New Town programme to look at the location of footfall dependant uses (such as retail) and accessibility has identified London Road as a good location for the long-term sustainability of such uses. However, this must not be to the detriment of the success of the Town Centre itself.

- 4.63 The Cranbrook Plan identifies parcels in the expansion areas for new mixed-use development fronting London Road, including in Treasbeare, Grange and Cobdens neighbourhood centres. These will serve residents in the expansion areas but are not intended to act as alternatives to the Town Centre. In order to sustain and promote the vitality and viability of Cranbrook Town Centre and to encourage passing trade from traffic on London Road, this policy identifies an area of London Road adjacent to the Town Centre where retail and other footfall dependant commercial uses will be supported. The creation of active frontages on the London Road in this location will also help to signpost people that they have arrived at the centre of the town and direct them to the main Town Centre.

CB25. London Road Improvements

CB25 London Road Improvements

London Road (B3174) will become a route “in” Cranbrook rather than a route around or through Cranbrook. The design and layout of both the road, its pedestrian and cycling facilities and development on either side of it must reflect this and achieve the highest quality of building design, green infrastructure and ease of movement for pedestrians and cyclists (both along and across the road), whilst it continues to serve as an important vehicular route.

Where changes in the vicinity of, or along on the London Road itself are proposed, they will need to demonstrate that they have had regard to the significance of the Road and any heritage assets that arise from it and where necessary propose appropriate mitigation if required.

Development will not be permitted unless it has been adequately demonstrated that the proposals will deliver safe, convenient and attractive crossing places (including where necessary all infrastructure needed to support their delivery) for vehicles, pedestrians and cyclists between land to the north and south of the London Road (the B3174). In particular it is expected that development in the Treasbeare expansion area will be linked to the Bluehayes expansion area and to existing development at Cranbrook and similarly the Grange expansion area to the Cobdens expansion area. Across all four expansion areas, land for crossing points on opposite sides of the road will need to be identified, coordinated and safeguarded to ensure that direct and fully connected routes are delivered.

In addition, development that fronts onto the London Road will need to contribute to the delivery of an attractive and pleasant environment which promotes social interaction between the occupiers of houses and all users of the highway, including pedestrians, cyclists and drivers of vehicles. Particular care will need to be given to the boundary treatment along the London Road where lengths of the highest quality hedgerow shall be retained and managed to maximise their biodiversity potential while still ensuring the best possible integration of people and place north and south of the Road and the creation of a sense of being within a town, with development appearing to front the Road, rather than turning its back on it.

Development proposals within the Cranbrook Plan Area will be required to make a proportionate financial contribution to the cost of delivering the London Road improvements (other than those access arrangements and crossing points required as part of the delivery of specific parcels of development).

- 4.64 Currently the London Road (B3174), formerly the A30, continues to represent a fast and relatively straight route which, with the exception of the roundabouts arising from the development of Cranbrook to date, largely ignores the town. In acting as an alternative route to the new A30, the London Road serves a purpose as a useful movement corridor east-west through this part of the District but its form, design and apparent speed, limits the invitation to stop, visit the town, town centre and the attractive country park. It is not appropriate that when the expansion of the town takes place – particularly where this is south of the London Road, that this road continues to present itself in the same way.
- 4.65 To do nothing and to fail to adequately address the road and the opportunities that it provides, would result in a road which acts in all other senses as a bypass albeit made worse by its dissection of the town. Such a situation would risk failing to draw people into the town and more fundamentally cut off the easy movement of people from one side of the road to the other – one half of the town to the other and the varying facilities that each already and will in the future possess.

Connectivity

- 4.66 In recognising this concern, it is therefore important that in any plans that come forward for the expansion of the town, provision is made to allow safe and easy crossing of the London road for cyclists and pedestrians. Land both north and south of the road should be retained and made available to accommodate crossing points which should be located in safe locations and along natural desire lines. An identified crossing point on one side of the road must be matched by coordinated and connected points opposite to ensure that a comprehensive and well used network of routes are provided to help strengthen the sustainability, legibility and health benefits of living and working in the town.
- 4.67 In particular it is noted that where land at Treasbeare adjoins the London Road, site levels are significantly higher than both the road level itself and that of Bluehayes to the north. In this location the resulting embankment is held in place by a timber crib lock wall. In addition it is noted that with only a shallow cover, the main heat main for the town runs parallel to the road through the elevated land within Treasbeare. In practice this makes the delivery of an active and connected frontage for the Treasbeare parcel – at least along this far western section where it sits opposite to Bluehayes, more difficult to achieve. However such an approach and resulting connection is important. As a result it is likely that the installation of a well designed gateway bridge which spans the road and allows a meaningful and attractive connection between Bluehayes and Treasbeare will be supported. If such a facility does come forward it is essential that land on both sides of the road and necessary for the grounding of such a structure is identified and retained for that purpose.
- 4.68 East-west connectivity through Cranbrook is also of great importance to the movement of people from one place to another. To date development has not provided pedestrian and cycle routes on the stretch of London Road immediately south of the town (further west, there have been on-street improvements to deliver a shared path), preferring to provide routes within the town itself; however these are not always obvious and can prove convoluted to users. Going forward and where possible, routes adjacent to the road itself would provide the best legibility for users and the expansion of the town delivers the opportunity to instigate this.

Frontage Design

- 4.69 Although it is expected that traffic speeds along the Road will be reduced and the tone and character of the “place” that will be the London Road corridor will change, it is important that special attention is given to the design and appearance of the built form and landscaping that will be employed along this route.
- 4.70 Irrespective of the number of roundabouts and pedestrian and cycle crossing points that are introduced along it, if development and landscaping work together to continue to “funnel” traffic through this environment without seeking to engage with it, the perception of a bypass would continue. In designing places and spaces that interact with the road it is important that there is a sense of being in rather than just passing through the town.
- 4.71 To best achieve this there will need to be a balance between keeping existing hedgerows and setting back the housing and other development behind such features, and removing identified sections, and allowing both housing and other infrastructure (including green infrastructure) to come forward and engage with the road frontage. Design quality of the housing must be at its highest along the road frontage which will present the “shop window” of the town to passing motorists. The aim will be to celebrate and engage with the development of the healthy new town with housing design of the highest standard; meaningful and strategically located green infrastructure; and an obvious ability that residents and visitors alike are not dependent on the car but have priority to move around the town in a safe and healthy way.

Flood Water Management

- 4.72 The handling of water within the extended town is already dealt with elsewhere with both the Local Plan and Policies in this DPD, but it is appropriate to consider at this point the identified areas of surface water which currently cause problems on London Road.
- 4.73 The Environment Agency have identified that two areas of surface water flooding occurring on the road by Bodley Bridge and the road junction to the west between the London Road and Cobden Lane should be addressed as part of development proposals as at both points serious flooding occurs³⁴.
- 4.74 The Environment Agency indicate that the cause of the flooding results from an inadequacy of the existing culvert under the road and channel upstream and down thereof. While it is recognised the channel down stream of Bodley Bridge is outside the scope of the current allocation, the works that are set to take place in the vicinity and upstream of these points of flooding present an opportunity to improve the situation. It is considered that Developers of sites which affect these areas should take every opportunity to improve the flood risk. Care would need to be taken to ensure that the downstream situation is not exacerbated, but with this safeguard in place, such an approach would improve the safety and functioning of the

³⁴ Environment Agency consultation response January 2018 <http://eastdevon.gov.uk/planning-libraries/cranbrook-plan-pa-2017-18/environmentagency.pdf>

London Road, its connection into the town and attractiveness of the eastern entrance into the town.



Figure 12 – London Road between Cranbrook Phase 1 and Treasbeare expansion area

CB26. Allotments

CB26 Allotments and community gardening

Allotment sites must be provided in accordance with the requirements of policies CB2 – CB5 inclusive and must:

1. Provide communal storage;
2. Be serviced by a water supply with adequate tap locations distributed around the site;
3. Provide access to a communal toilet;
4. Be situated in an accessible location; and
5. Be so located or laid out to enable the collection and drop-off of bulky goods and produce.

Planning applications must include space for community gardening as an integral part of street design. Allotment and community gardening design should take account of the accessibility needs of different members of the community and include opportunities for features such as raised beds and planters with suitable access arrangements.

- 4.75 The development of new homes should contribute to the delivery of sustainable communities with an appropriate range of community infrastructure, such as schools, primary health care infrastructure, sports / recreation and community facilities / village halls.
- 4.76 The Cultural Development Strategy³⁵ recognises the importance of providing flexible community spaces and places; co-located facilities supporting social interaction; and open and green space, including for growing food.

Allotments

- 4.77 The Local Authority will support and encourage local food growing by seeking provision of new allotments and/or community food growing sites.
- 4.78 The individual policies for the four expansion areas of Cranbrook each identify land areas for use as allotments. It is important to ensure that allotments are laid out in an appropriate fashion to ensure suitable facilities are provided and that they are accessible by all. The placing of sheds, polytunnels and greenhouses on individual allotments can appear

³⁵ Cultural Development Strategy <http://eastdevon.gov.uk/media/2260182/cranbrook-in-common-cultural-development-strategy.pdf>

incongruous in the landscape. In order to minimise the visual impacts of allotment provision, each allotment site should provide communal storage facilities for allotment holders.

- 4.79 Community gardening projects foster good community relations, encourage activity and promote healthy eating and the growing of food. Incredible Edible is an already established community gardening group in Cranbrook and is involved in the growing of produce in street planters in the town as well as having a growing space at Cranbrook Education Campus. The expansion of similar schemes across the expansion of Cranbrook is encouraged in the interests of the health and wellbeing of residents and the appearance of the street scene.

CB27. Landscape, Biodiversity and Drainage

CB27 Landscape, Biodiversity and Drainage

Development will only be permitted where it is in accordance with an up to date Landscape, Biodiversity and Drainage Strategy (LBDS), and illustrated LBDS Framework plan, which has been agreed in writing by the Local Planning Authority. A separate LBDS should cover each expansion area in full and where such areas are broken down, it is expected that different developers will demonstrate that they have worked together to prepare the final document. In addition the LBDS will need to be periodically reviewed so that it remains in line with new legislation, guidance and best practice with a formal review at least every 5 years.

The following components and approaches will be included within each individual LBDS to ensure shared commitments when bringing forward different phases of development and a consistency of approach between different disciplines:

1. A defined green infrastructure framework for the expansion sites, which incorporates and integrates landscape, biodiversity, heritage features, conservation and sustainable drainage;
2. Be prepared in conformity with landscape character, biodiversity and sustainable drainage guidance;
3. Provide the framework for the detailed design process, the aim of which is to create a sense of place for the new community;
4. Provide principles of advanced works for LBDS implementation, management and future maintenance; and
5. Provide the strategic principles of how open space areas are to be managed and maintained.

- 4.80 The original LBDS for Cranbrook was submitted as part of the outline planning application for the first 2,900 dwellings and was written in 2010. The main objectives of the LBDS were to set out strategic commitments which would be undertaken as part of the Cranbrook development and to provide technical details to supplement the outline planning application.
- 4.81 The expansion of the new town of Cranbrook is proposed to grow to almost 8,000 homes within the plan period. The LBDS will be a tool that both the applicant and the Local Planning Authority will use with which to assess applications for development. It is intended that the principles of the original LBDS can be built upon and added to as Cranbrook develops beyond the original boundaries and into the future.

- 4.82 A sound evidence base will be essential to support each individual LBDS. Relevant background data and technical reports will need to be included to provide context to the proposals. Base evidence (e.g. wildlife surveys) will need to be up-to-date so that they are relevant at the time of submission of reserved matters applications.
- 4.83 The Cranbrook Plan Area contains a number of natural features such as trees, hedges and water bodies. These vary in how important they are in contributing to the local landscape and their biodiversity value. A strategic commitment of an LBDS will be to incorporate biodiversity, conservation and sustainable drainage proposals into the open space and landscape network. As a result all natural features will need to be assessed, recording their ecological, archaeological, landscape and arboricultural values in order to establish importance, methods of protection and enhancement and to minimise the loss of important distinctive features.
- 4.84 The agreement of the Local Planning Authority of each LBDS will be required in advance of the first planning permission for each expansion area (Outline or full permission) and compliance and review mechanisms secured through the use of a S106 agreement.

Landscape

- 4.85 Key strategic commitments for landscape will be to provide a strongly defined and clearly understood landscape structure for the site and to conform to local landscape character guidance, and utilising local landscape materials. A defined hierarchy for open space and public areas shall be provided, in accordance with the open space requirements for each expansion area. The LBDS will inform routes of access to, and circulation between, recreational open spaces.
- 4.86 Trees and hedgerows will need to be assessed recording their ecological, landscape and archaeological and arboricultural values to ensure retention of good quality hedgerows, hedgebanks, tree groups and individual trees. This will aid retention and enhancement of landscape character and maintain important habitats by utilising them as key features of the layout and as habitat corridors. Trees and hedgerows proposed for retention and removal shall be indicated on an illustrated framework plan.

Biodiversity

- 4.87 The landscape areas within the expansion areas will be multifunctional, providing space for sport and informal recreation and an attractive landscape that complements the development and gives a strong sense of place and enhances biodiversity. As a result it will be important and a key commitment of each LBDS that the level of biodiversity is enhanced, habitat connectivity within the site and adjacent habitats is promoted, and that long term nature conservation values of the site are secured.

Drainage

- 4.88 Sustainable drainage systems (SuDS) are an increasingly important part of our green infrastructure; it is vitally important that drainage is considered at the outset and informs the early design of development proposals. SuDS mimic natural drainage process to reduce the

effect on the quality and quantity of runoff from developments and provide amenity and biodiversity benefits.

- 4.89 Each LBDS will need to set out a clear strategy for the relevant site, creating an appropriate SuDs scheme. The strategy will clearly demonstrate how the natural means of surface water discharge from the site will be replicated, utilising existing watercourses to convey water from the site and ensuring that peak surface water flows do not exceed pre-development conditions, all in line with the SuDS management train which sets out a hierarchy of prevention, source control, site control and then regional control.



Figure 13 - Cranbrook Country Park, which links phases 1 and 2 of the original outline planning permission site and incorporates a range of habitats and opportunities for recreation.

CB28. Design and Construction of Sports Pitches

CB28 Design and Construction of Sports Pitches

All pitches and courts provided at Cranbrook in order to meet the requirements of Policies CB3 and CB4 must be constructed to standards set out by and designed in consultation with the relevant sport's National Governing Body (Football Association, Rugby Football Union, English Cricket Board, Lawn Tennis Association etc.) and for the avoidance of doubt include effective drainage.

In addition to the pitch and court requirements set out in Policies CB3 and CB4, there is a need to ensure that sufficient and appropriate ancillary facilities are also provided at each hub. These shall include:

1. Changing facilities sufficient to meet the number and type of pitches/courts provided at each hub;
2. Sufficient bar/social space;
3. Kitchen;
4. Dedicated medical room;
5. Toilets (separate for players, match officials and spectators);
6. Showers (in each changing room including the match officials);
7. Kit lockers;
8. Maintenance storage; and
9. Car parking.

Facilities should be designed in consultation with and in line with guidance produced by Sport England and the relevant governing bodies. There should be one changing/clubhouse facility for each sports hub containing all of the above elements.

Facilities should be designed to meet the sports needs of the community. They should not double up as general recreation areas/parks which are required in addition to these facilities. Sports pitches must not be accessible by dogs.

- 4.90 The provision of high quality and accessible range of community outdoor sports facilities is needed to support the new community of Cranbrook. The vision for Cranbrook, in line with its healthy new towns status and that of seeking to encourage active lifestyles, is to achieve an increase in sport and physical activity. It is considered that this can be achieved by maintaining and improving the playing pitches and outdoor sports facilities within Cranbrook.
- 4.91 In order to achieve this, as a minimum, all sports pitches should have an appropriately maintained and drained playing surface and be serviced by appropriately built accommodation (changing rooms/ pavilion) and parking space.

- 4.92 Phasing of these facilities will be agreed and secured through the Phasing policy CB7 of this Cranbrook Plan and will seek to ensure that they are delivered in a timely fashion to the delivery of housing in order to ensure adequate facilities are available to serve the population.

CB29. Tillhouse Farm Redevelopment

CB29 Tillhouse Farm Redevelopment

Proposals for the Tillhouse Farm complex of buildings will be supported where they recognise the significance of the farm complex and its individual components as a heritage asset within the town and make provision for its restoration and conservation such that the:

1. Layout of the buildings and associated yard is retained;
2. Buildings are returned to their former appearance;
3. All remaining historic features are retained and restored; and
4. Features that have been lost as a result of fire damage are reinstated to replicate their previous form wherever possible.

Where proposals seek to deviate from the asset's historic form and appearance, they will need to demonstrate that the changes proposed are the minimum reasonably necessary to facilitate the restoration of the building and to bring it back into a viable use.

Proposals that bring the buildings into public ownership and facilitate community activity and uses will be particularly encouraged.

- 4.93 Heritage assets are an irreplaceable resource and play a key role in place making, by helping to make a positive contribution to local character and the evolving sense of identity. Local Authorities are encouraged to recognise the positive contribution that the conservation of heritage assets can make to help create a sustainable community and should therefore not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure that any heritage asset is retained where possible.

Till House Farm and Surrounding Land

- 4.94 Tillhouse Farm is a Grade II listed farmhouse with associated curtilage listed barns forming a courtyard that is located in a central part of Cranbrook close to the west of England Exeter-Waterloo rail line and adjacent to the Country Park.
- 4.95 This was a distinctive longhouse with cob walls, a stone plinth and thatched roof. It is one of only two listed structures in the boundaries of the original outline planning permission for the town (the other being the Old Rockbeare Bridge immediately north of London Road) and is an important reminder of the agricultural past of the land upon which the town now stands. Unfortunately the main farmhouse building is currently in a poor state of repair having suffered from substantial fire damage in 2016 but nevertheless remains an important heritage asset for Cranbrook. The remaining walls have been protected but substantial investment is needed to restore the building to its former glory. Its location at the heart of the town provides a unique opportunity to retain a heritage asset in a prominent and accessible

location and therefore an alternative community or other viable use that allows the building to be restored will be supported.



Figure 14 – Grade II listed Tillhouse Farmhouse, located in phase 2 of Cranbrook, south of the Country Park

Monitoring

5.1 Monitoring is an essential component of the planning policy process and is a key means by which to assess the success or otherwise of the policies of this Cranbrook Plan. By setting outcomes we wish to see from the implementation or application of the policies of the Plan, we will be able to assess if the policy is successful. This will be used to inform what changes, if any, are required, such as the use of SPD for further detail or the revision of a policy when the Plan is updated.

5.2 The following table identifies key monitoring indicators.

Vision/Objective/Aspiration	Key Policy or Strategy	Indicators and target
Delivery of the homes set out in this Plan over the Plan period.	CB2 Bluehayes Expansion Area CB3 Treasbeare Expansion Area CB4 Cobdens Expansion Area CB5 Grange Expansion Area CB7 Phasing	Delivery of housing in the expansion areas Completion of the expansion areas within the Plan period.
All residents have convenient access to open space and recreation and sports facilities that are safe and of good quality.	CB2 Bluehayes Expansion Area CB3 Treasbeare Expansion Area CB4 Cobdens Expansion Area CB5 Grange Expansion Area CB7 Phasing CB26 Allotments CB28 Design and Construction of Sports Pitches	Open space, recreation and sports facilities are delivered in a timely and phased process alongside the housing and are well used by residents.
Provide the resources to teach and develop skills in the population of the town.	CB3 Treasbeare Expansion Area CB4 Cobdens Expansion Area	Deliver the additional primary, secondary and SEND school places at the required trigger points to ensure that schools aren't over capacity.
New development to be accessible to health care facilities and supported by new provision in the town and neighbourhood centres.	CB1 Health and Wellbeing at Cranbrook CB3 Treasbeare Expansion Area CB4 Cobdens Expansion Area CB5 Grange Expansion Area CB6 Cranbrook Infrastructure Delivery CB22 Cranbrook Town Centre	Sufficient opportunity exists for all residents to access primary health care and other health services to meet their needs. Achieved through the delivery of the Health and Wellbeing Hub in the Town Centre and the securing of satellite services in the neighbourhood

		centres to implement a New Model of Care.
A greater percentage of the population of the town using walking, cycling and other sustainable modes of transport to travel from one place to another.	CB1 Health and Wellbeing at Cranbrook CB9 Public Transport Enhancements CB17 Amenity of Future Occupiers CB19 Coordinated sustainable travel	Streets and routes are laid out in a logical fashion to deliver routes which are accessible and attractive to users and provide suitable links between housing, the town centre, employment opportunities, education facilities and public transport nodes.
Ensure everybody has the opportunity to live in a decent home which meets their needs.	CB1 Health and Wellbeing at Cranbrook CB11 Cranbrook Affordable Housing CB12 Cranbrook Custom and Self Build Housing CB17 Amenity of Future Occupiers	Affordable and custom and self-building housing is being provided at a rate which meets with the policy minimum. All homes meet the Nationally Described Space Standards. Housing waiting lists for affordable housing at Cranbrook are minimal and custom and self-build plot delivery is meeting demand.
Cranbrook is a zero carbon town.	CB13 Delivering Zero Carbon CB14 Safeguarding of land for energy uses	The expansion areas of Cranbrook are connected to a district heating system and are maximising opportunities for the use of renewable energy. New buildings are delivered achieving the required improvement over and above Building Regulations requirements. New homes are resilient to climate change.
Cranbrook is served by gigabit broadband technology.	CB18 Digital connectivity	All homes and other occupied buildings have the connectivity to access gigabit broadband speeds.
Cranbrook has a thriving economy, with jobs for all and a vibrant town centre.	CB1 Health and Wellbeing at Cranbrook CB3 Treasbeare Expansion Area CB4 Cobdens Expansion Area CB5 Grange Expansion Area	Cranbrook Town Centre becomes built out, delivering a range of footfall dependant uses, is occupied by national and local business, including those originating from

	<p>CB22 Cranbrook Town Centre</p>	<p>enterprising Cranbrook residents and has a day time and night time economy. Employment land in Treasbeare is providing employment for Cranbrook residents and businesses.</p> <p>Occupancy rates in both the town centre, neighbourhood centres and the employment land are high.</p>
<p>Development at Cranbrook sustains and improves habitats suitable for biodiversity, including the European protected sites of the Exe Estuary and Pebblebed Heaths.</p>	<p>CB2 Bluehayes Expansion Area CB3 Treasbeare Expansion Area CB4 Cobdens Expansion Area CB5 Grange Expansion Area CB22 Cranbrook Town Centre CB15 Delivery of Suitable Alternative Natural Green Space CB27 Landscape, Biodiversity and Drainage</p>	<p>LBDS documents are produced for each expansion area and regularly reviewed.</p> <p>Planning applications lead to net increases in biodiversity across Cranbrook.</p> <p>SANGS is delivered at Cranbrook in a phased manner, in advance of housing occupations.</p> <p>Off-site financial contributions are secured to enable the remaining mitigation for the Pebblebed Heaths and Exe Estuary to be provided.</p>

Appendix 1 – Status of Policies

The table below sets out where policies of the East Devon Local Plan 2013-2031 are superseded in full or in part by the Cranbrook Plan and which policy or policies they are replaced by. Any policy which is superseded in full or in part is only superseded for development proposals within the Cranbrook Plan Area as shown on the Policies Map.

East Devon Local Plan 2013-2031 Policy ref.	Superseded in Cranbrook Plan Area? In part or in full?	New Cranbrook Plan DPD policy reference
Strategy 1- Spatial Strategy for Development in East Devon	No	N/A
Strategy 2 – Scale and Distribution of Residential Development	No	N/A
Strategy 3 – Sustainable Development	No	N/A
Strategy 4 – Balanced Communities	No	N/A
Strategy 5 – Environment	No	N/A
Strategy 5B – Sustainable Transport	No	N/A
Strategy 6 – Development within Built-up Area Boundaries	Yes – in part where new Built-up area boundaries for Cranbrook and Broadclyst Station are defined.	CB8 – Cranbrook and Broadclyst Station Built up Area Boundary
Strategy 7 – Development in the Countryside	No	N/A
Strategy 8 – Development in Green Wedges	Yes – in part where this plan allocates land for development currently part of the Rockbeare Green Wedge.	CB3 – Treasbeare Expansion Area
Strategy 9 – Major Development at East Devon’s West End	No	N/A

East Devon Local Plan 2013-2031 Policy ref.	Superseded in Cranbrook Plan Area? In part or in full?	New Cranbrook Plan DPD policy reference
Strategy 10 – Green Infrastructure in East Devon’s West End	No	N/A
Strategy 11 – Integrated Transport and Infrastructure Provision at East Devon’s West End	No	N/A
Strategy 12 – Development at Cranbrook	Yes – in full	All policies of this DPD
Strategy 13 – Development North of Blackhorse/Redhayes	No	N/A
Strategy 14 – Development of an Urban Extension at Pinhoe	No	N/A
Strategy 15 – Intermodal Interchange	No	N/A
Strategy 17 – Future Development at or near Exeter International Airport	No	N/A
Strategy 18 – Future Development of Exeter Airport Business Park	No	N/A
Strategy 20 – Development at Axminster	No	N/A
Strategy 21 – Budleigh Salterton	No	N/A
Strategy 22 – Development at Exmouth	No	N/A
Strategy 23 – Development at Honiton	No	N/A

East Devon Local Plan 2013-2031 Policy ref.	Superseded in Cranbrook Plan Area? In part or in full?	New Cranbrook Plan DPD policy reference
Strategy 24 – Development at Ottery St Mary	No	N/A
Strategy 25 – Development at Seaton	No	N/A
Strategy 26 – Development at Sidmouth	No	N/A
Strategy 26B – De-development of Redundant Offices Complex at Winslade Park and Land Adjoining Clyst St Mary	No	N/A
Strategy 26C – Development at Uplyme	No	N/A
Strategy 27 – Development at the Small Towns and Larger Villages	No	N/A
Strategy 28 – Sustaining and Diversifying Rural Enterprise	No	N/A
Strategy 29 – Promoting Opportunities for Young People	No	N/A
Strategy 30 – Inward Investment, Communication Links and Local Benefits	No	N/A
Strategy 31 – Future Job and Employment Land Provision	No	N/A
Strategy 32 – Resisting Loss of Employment, Retail and Community Sites and Buildings	No	N/A
Strategy 33 – Promotion of Tourism in East Devon	No	N/A

East Devon Local Plan 2013-2031 Policy ref.	Superseded in Cranbrook Plan Area? In part or in full?	New Cranbrook Plan DPD policy reference
Strategy 34 – District Wide Affordable Housing Provision Targets	Yes – in part where it relates to development at Cranbrook	CB11 – Cranbrook Affordable Housing
Strategy 35 – Exception Mixed Market and Affordable Housing At Villages, Small Towns and Outside Built-up Area Boundaries	No	N/A
Strategy 36 – Accessible and Adaptable Homes and Care/Extra Care Homes	No	N/A
Strategy 37 – Community Safety	No	N/A
Strategy 38 – Sustainable Design and Construction	Yes – in part where references are made to the Code for Sustainable Homes and BREEAM standards	CB13 – Delivering zero carbon
Strategy 39 – Renewable and Low Carbon Energy Projects	No	N/A
Strategy 40 – Decentralised Energy Networks	Yes – in full	CB13 – Delivering zero carbon
Strategy 41 – Allowable Solutions	Yes – allowable solutions not taken forward by Government	N/A
Strategy 43 – Open Space Standards	Yes – in part. Superseded only where development proposals are on land allocated in this DPD.	CB2 – Bluehayes Expansion Area, CB3 – Treasbeare Expansion Area, CB4 – Cobdens Expansion Area, CB5 – Grange Expansion Area
Strategy 44 – Undeveloped Coast and Coastal Preservation Area	No	N/A

East Devon Local Plan 2013-2031 Policy ref.	Superseded in Cranbrook Plan Area? In part or in full?	New Cranbrook Plan DPD policy reference
Strategy 45 – Coastal Erosion	No	N/A
Strategy 46 – Landscape Conservation and Enhancement and AONB's	No	N/A
Strategy 47 – Nature Conservation and Geology	Yes – in part where reference is made to different population multipliers per dwelling and where reference is made to CIL at Cranbrook (or implied by reference to it being with the West End) as Cranbrook will be funded by S106 contributions.	CB15 – Delivery of Suitable Alternative Natural Green Space
Strategy 48 – Local Distinctiveness in the Built Environment	No	N/A
Strategy 49 – The Historic Environment	No	N/A
Strategy 50 – Infrastructure Delivery	No	N/A
D1 – Design and Local Distinctiveness	No	N/A
D2 – Landscape Requirements	No	N/A
D3 – Trees and Development Sites	No	N/A
D4 – Applications for Display of Advertisements	No	N/A
D6 – Locations without Access to Natural Gas	No	N/A

East Devon Local Plan 2013-2031 Policy ref.	Superseded in Cranbrook Plan Area? In part or in full?	New Cranbrook Plan DPD policy reference
D7 – Agricultural Buildings and Development	No	N/A
D8 – Re-use of Rural Buildings Outside of Settlements	No	N/A
EN1 – Land of Local Amenity Importance	No	N/A
EN2 – The Valley Parks in Exmouth	No	N/A
EN3 – Land at the Byes in Sidmouth	No	N/A
EN4 – Protection of Local Nature Reserves, County Wildlife Sites and County Geological Sites	No	N/A
EN5 – Wildlife Habitats and Features	No	N/A
EN6 – Nationally and Locally Important Archaeological Sites	No	N/A
EN7 – Proposals Affecting Sites which may potentially be of Archaeological Importance	No	N/A
EN8 – Significance of Heritage Assets and their Setting	No	N/A
EN9 – Development Affecting a Designated Heritage Asset	No	N/A
EN10 – Conservation Areas	No	N/A
EN13 – Development on High Quality Agricultural Land	No	N/A

East Devon Local Plan 2013-2031 Policy ref.	Superseded in Cranbrook Plan Area? In part or in full?	New Cranbrook Plan DPD policy reference
EN14 – Control of Pollution	No	N/A
EN16 – Contaminated Land	No	N/A
EN17 – Notifiable Installations	No	N/A
EN18 – Maintenance of Water Quality and Quantity	No	N/A
EN19 – Adequacy of Foul Sewers and Adequacy of Sewage Treatment Systems	No	N/A
EN21 – River and Coastal Flooding	No	N/A
EN22 – Surface Run-Off Implications of New Development	No	N/A
EN25 – Development Affected by Coastal Change	No	N/A
H2 – Range and Mix of New Housing Development	Yes – in full in so far as it relates to development at Cranbrook	CB12 – Custom and Self-build CB16 – Design Codes and Place Making CB17 – Amenity of future occupiers
H3 – Conversion of Existing Dwellings and Other Buildings to Flats	No	N/A
H4 – Dwellings for Persons Employed in Rural Businesses	No	N/A
H5 – Occupancy Conditions on Rural Workers Dwellings	No	N/A
H6 – Replacement of Existing Dwellings in the Countryside	No	N/A

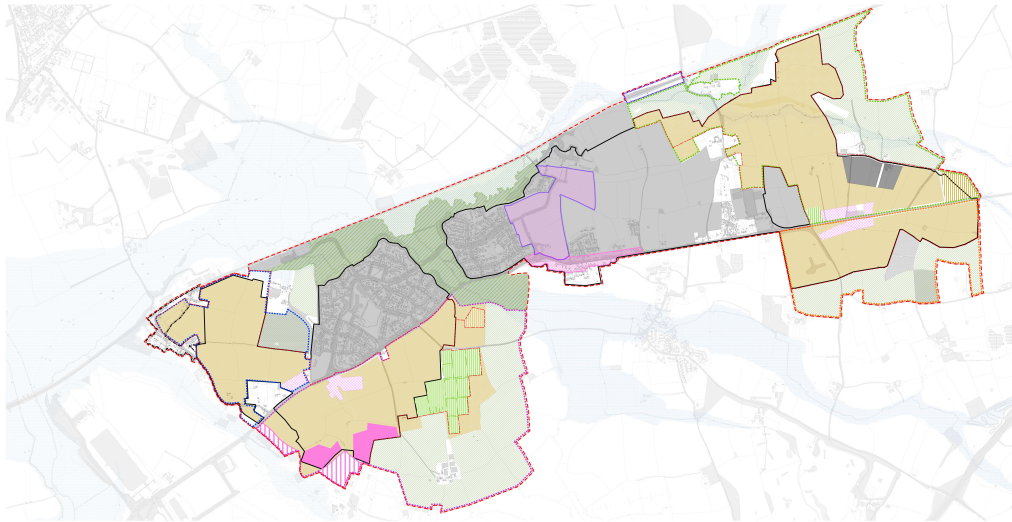
East Devon Local Plan 2013-2031 Policy ref.	Superseded in Cranbrook Plan Area? In part or in full?	New Cranbrook Plan DPD policy reference
H7 – Sites for Gypsies and Travellers	No	N/A
E2 – Employment Generating Development in Built-up Areas	No	N/A
E4 – Rural Diversification	No	N/A
E5 – Small Scale Economic Development in Rural Areas	No	N/A
E7 – Extensions to Existing Employment Sites	No	N/A
E9 – Town Centre Vitality and Shopping Areas	Yes – where it relates to land within the Cranbrook Town Centre	CB22 – Cranbrook Town Centre
E10 – Primary Shopping Frontages	No	N/A
E11 – Large Stores and Retail Related Uses in Area Centres	No	N/A
E12 – Neighbourhood Centres and Shops	No	N/A
E13 – Use of Upper Floors in Shopping Developments	No	N/A
E14 – Change of Use of Village Shops or Services	No	N/A
E15 – Retail Development in Rural Areas outside Built-up Area Boundaries	No	N/A
E16 – Proposals for Holiday or Overnight Accommodation and Associated Facilities	No	N/A
E17 – Principal Holiday Accommodation Areas	No	N/A

East Devon Local Plan 2013-2031 Policy ref.	Superseded in Cranbrook Plan Area? In part or in full?	New Cranbrook Plan DPD policy reference
E18 – Loss of Holiday Accommodation	No	N/A
E19 – Holiday Accommodation Parks	No	N/A
E20 – Provision of Visitor Attractions	No	N/A
RC1 - Retention of Land for Sport and Recreation	No	N/A
RC2 – New Open Space, Sports Facilities and Parks	No	N/A
RC3 – Allotments	No	N/A
RC4 – Recreation Facilities in the Countryside and on the Coast	No	N/A
RC5 – Community Buildings	No	N/A
RC6 – Local Community Facilities	No	N/A
RC7 – Shared Community Facilities	No	N/A
TC1 – Telecommunications	No	N/A
TC2 – Accessibility of New Development	No	N/A
TC3 – Traffic Management Schemes	No	N/A
TC4 – Footpaths, Bridleways and Cycleways	No	N/A
TC5 – Safeguarding Disused Railway Lines	No	N/A
TC6 – Park and Ride and Park and Share/Change	No	N/A

East Devon Local Plan 2013-2031 Policy ref.	Superseded in Cranbrook Plan Area? In part or in full?	New Cranbrook Plan DPD policy reference
TC7 – Adequacy of Road Network and Site Access	No	N/A
TC8 – Safeguarding of Land Required for Highway and Access Improvements	No	N/A
TC9 – Parking Provision in New Development	Yes – in full in so far as it relates to development at Cranbrook	CB20 – Plug-In and ultra-low emission vehicle charging CB21 – Parking at Cranbrook
TC10 – Rear Servicing of Shopping/Commercial Development	No	N/A
TC11 – Roadside Service Facilities	No	N/A
TC12 – Aerodrome Safeguarded Areas and Public Safety Zones	No	N/A



Cranbrook Plan - Policies Map



Key

<p>Strategic policies</p> <ul style="list-style-type: none"> CB1: Highways Expansion Area including 2016/17 CB2: Western Expansion Area including 2016/17 CB3: Eastern Expansion Area including 2016/17 CB4: Orange Expansion Area including 2016/17 CB5: CB1/2/3/4/5: Non-specific use allocations CB1/2/4: Open and flexible allocations CB1: Employment and allocation CB1/2/4: Sports pitches CB4: Children's education land CB5: Built-Up Area boundary of Cranbrook 	<p>Non-strategic policies</p> <ul style="list-style-type: none"> CB2: Cranbrook Town Centre CB3: Residential Development in the Town Centre and Neighbourhood centres CB4: London Road commercial and retail proposal CB2: Built-Up Area boundary of Bessington CB3: Land safeguarded for second station CB4: Land safeguarded for energy use CB5: Delivery of Suitable Alternative Natural Green Space 	<p>For information</p> <ul style="list-style-type: none"> Flood Zone 2 Existing Cranbrook outline permission Cranbrook Plan area Allotment boundary Cranbrook Country Park 	<p>Scale: 1:10,000 <small>© Crown copyright and database right 2018 Ordnance Survey 10002746</small></p>
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Report to: **Strategic Planning Committee**

Date of Meeting: Wednesday 20 February 2019

Public Document: Yes

Exemption: None

Review date for release None

Agenda item: 7

Subject: **Community Infrastructure Levy Preliminary Draft Charging Schedule: consultation document**

Purpose of report: To set out the context for the Community Infrastructure Levy (CIL) and East Devon's current charging schedule, and highlight the key findings from the viability evidence that will be used to inform a revision of the charging schedule. The Preliminary Draft Charging Schedule consultation document is presented for approval by the Committee for a four week consultation period.

Recommendation: **Members are asked:**

- 1. To note the findings of the "CIL Review and Cranbrook DPD Viability Report"**
- 2. To approve the Community Infrastructure Levy Preliminary Draft Charging Schedule for public consultation over a period of four weeks**

Reason for recommendation: To ensure Members are aware of the findings of the CIL Review and Cranbrook DPD Viability Report, and to seek approval for public consultation on the Preliminary Draft Charging Schedule.

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Tel: 01395 571684

Financial implications: The determination of CIL charges at an appropriate viability level is outlined in the report, there is an increase in the overall level of income derived which does aid infrastructure delivery and when combined with the recommendations relating to the delivery of Cranbrook through s106 agreements do help mitigate the substantial funding deficit position. There is still however a funding gap where resources from differing organisations will need to be used to meet infrastructure requirements.

Legal implications: There are no other legal implications at this stage other than as set out in this report.

Equalities impact: Low Impact

Risk: Low Risk

When preparing a charging schedule, CIL regulations require public consultation on a 'preliminary draft'. This consultation provides the

opportunity for comment at this early stage, allowing changes to be made to reflect responses, where appropriate. Given this, there is a low risk associated with this report.

Links to background information:

- Minutes of the Meeting of the Council, 20 April 2016, item 78: <http://eastdevon.gov.uk/media/1684688/200416-council-mins.pdf>
- East Devon adopted CIL Charging Schedule: <http://eastdevon.gov.uk/media/1680258/adopted-charging-schedule.pdf>
- East Devon Infrastructure Delivery Plan Review (November 2017): http://eastdevon.gov.uk/media/2270747/idp-review-2017_report.pdf
- Community Infrastructure Levy Planning Practice Guidance: <https://www.gov.uk/guidance/community-infrastructure-levy>
- [CIL Review and Cranbrook DPD Viability Study:](#)

Link to Council Plan: Developing an outstanding local economy; Delivering and promoting our outstanding environment; Continuously improving to be an outstanding council

Report in full

1. Background

- 1.1 The Community Infrastructure Levy (CIL) is a tool to help deliver infrastructure to support development. CIL is payable on development that creates net additional floor space, expressed as pounds per square metre. However, some development is exempt from paying CIL, for example if less than 100 square metres in size (apart from new dwellings), dwellings built by self/custom builders, social housing, and charitable development. The rate of CIL is set in a “charging schedule”.
- 1.2 Members will be aware that the council charge CIL on new development in East Devon (as appropriate), having adopted its CIL Charging Schedule in April 2016. The council began charging CIL on 1 September 2016.
- 1.3 The current Charging Schedule contains three different charging ‘zones’ for residential development:
 - £80 per square metre (psm) at Axminster, Cranbrook (permitted area), Exmouth, Honiton, Ottery St Mary, Seaton and edge of Exeter allocation sites
 - £68 psm at Cranbrook expansion areas
 - £125 psm at Sidmouth, Coast and Rural (the rest of East Devon)
- 1.4 Retail development outside town centres and Cranbrook is also subject to CIL, charged at £150 psm. All other non-residential uses do not pay CIL.
- 1.5 In accordance with CIL regulations, these figures are index-linked on January 1 each year, meaning the rates for development permitted this year are now slightly higher than when adopted in 2016 (see figure 1 below for how the current indexed CIL rate compares to the proposed new rate).
- 1.6 On adoption of the Charging Schedule, the council made clear that an early review would be required. A key reason for reviewing and then revising the Charging Schedule is to align with the emerging Cranbrook Plan. This will ensure a consistent approach to infrastructure delivery at the town (i.e. section 106 rather than CIL), and align the boundary of Cranbrook expansion areas with that of a revised CIL charging zone – for example, although most of the expansion areas in the Cranbrook Plan are within the £68 psm zone,

there are some areas that would be charged £125 psm (e.g. Grange) under the current Charging Schedule, which would clearly not be justified.

- 1.7 The revised Charging Schedule takes account of updated national policy and guidance on viability issues, latest information on development costs and values in East Devon, and any lessons learnt from applying the current Charging Schedule.
- 1.8 As noted at the last Strategic Planning Committee (29 January 2019), the Government has published draft CIL regulations that make significant changes to the system. These include removing “regulation 123 lists” of infrastructure to be funded by CIL, removal of the section 106 “pooling” restriction, and streamlining the production of a charging schedule so that only one round of consultation is required (rather than two) before it is submitted for Examination. The council intends to progress the CIL Charging Schedule assuming that these regulations will be finalised in due course. Having considered the draft regulations and transitional arrangements, consultation on a preliminary draft charging schedule is still required until the final regulations are published. There is no indication as to when the final regulations will be published, so it is recommended to progress with consultation on a preliminary draft, rather than wait.
- 1.9 When setting a CIL rate, a balance must be struck between the desirability of using CIL to fund infrastructure to support development, and the potential effects of CIL on development viability. The infrastructure requirements to support development are set out in the Infrastructure Delivery Plan review (November 2017). This identifies a significant infrastructure cost to deliver the Local Plan and emerging Cranbrook Plan, with a funding gap of some £270.9m. An estimated £30.9m of CIL would be generated from the adopted Charging Schedule – this amount includes CIL from the Cranbrook expansion areas, so will be lower if this is not charged CIL in the future (as proposed). The large infrastructure funding gap demonstrates the need to charge CIL – potential effects on viability are discussed in the next section.
- 1.10 There is a risk that changing the CIL rates impacts on our ability to provide policy compliant levels of affordable housing. While the Three Dragons viability work is based on providing the proposed CIL rates and policy compliant affordable housing levels and also includes a not insignificant margin; experience with the existing charging schedule has shown that site specific abnormal costs can often mean that policy compliant affordable housing levels are not viable. The new definition of affordable housing within the NPPF puts greater emphasis on affordable products to buy which are more viable for developers to provide. This may improve the position. It is inherently difficult to model abnormal costs how it is considered that Three Dragons work should have sufficient leeway built into it to allow for this. In any event this is the first round of consultation and it will be interesting to get feedback from the development industry on the viability of the revised charging schedule before proceeding.

2. CIL Review and Cranbrook DPD Viability Study

- 2.1 As noted at Strategic Planning Committee on 27 November 2018, consultants have been appointed to prepare viability evidence that will inform the revised CIL Charging Schedule (alongside a viability assessment of the Cranbrook Plan). This evidence is set out in the “CIL Review and Cranbrook DPD Viability Study”, prepared by Three Dragons with Ward Williams Associates, January 2019.
- 2.2 This study considers updated national policy and guidance on viability issues, latest information on development costs and values in East Devon, and then makes an assessment of the viability of typical sites envisaged to come forward, considering Local Plan policy requirements and other costs.
- 2.3 In general, the viability study recommends an increase in residential CIL rates compared to the current adopted charging schedule (as indexed), although rates are still within the appropriate viability headroom considered in the study. The exception is Cranbrook, which is not able to support CIL (residential and non-residential) due to the level of section 106

planning obligations and other costs associated with that development. Outside Cranbrook, the study recommends differing charging zones for general residential development at Sidmouth and Budleigh Salterton (£200 per square metre), and elsewhere (£150 per square metre). This rate reduces for strategic allocated sites, due to additional infrastructure costs provided through section 106 planning obligations – if the council is concerned about risk to delivery on strategic allocated sites, there is an option for low or zero CIL, which would allow for more on-site infrastructure and other planning obligations. In order to provide greater clarity, we suggest that strategic allocated sites are defined as those which are 150 dwellings or greater, consistent with the scale of development that applies higher section 106 costs used in the viability study. A lower rate for strategic sites in Sidmouth and Budleigh Salterton is recommended by the consultants but as there are no such sites in the local plan it is considered that there is no need to include a charging category for this form of development.

- 2.4 It is recommended that CIL is not charged on rural exception sites, to reduce the level of market housing that may be required to subsidise the provision of affordable housing. CIL is also not viable for sheltered housing, extra care housing and care homes.
- 2.5 For non-residential development, the evidence shows that only retail development would be viable with CIL, but at a lower rate than the current charging schedule due to a weaker retail sector than previously. It is recommended that the rate applies to all retail development within use class A and outside of town centres. The study considers a range of other non-residential uses, noting that most share similar characteristics for the purposes of viability so are covered by the same rate.
- 2.6 Figure 1 below presents the current indexed CIL rate alongside the recommended CIL rates from the viability study.

Figure 1: Current and potential residential and non-residential CIL rates¹

Type and location of development	Current indexed CIL rate (per square metre)	Proposed new CIL rate (per square metre)
All development in Cranbrook	£80.09	£0
General residential development in Sidmouth and Budleigh Salterton	£147.23	£200
General residential development in the rest of East Devon	£94.23 (urban area) or £147.23 (rural area)	£150
Sheltered housing, extra care housing and care homes	£0-£147.23	£0
Rural Exception Sites	£147.23	£0
Strategic allocated sites ² in the rest of East Devon excluding Sidmouth and Budleigh Salterton	£94.24	£100
Retail (out of centre)	£176.67	£84
All other non-residential uses	£0	£0

- 2.7 The study recommends that the council monitors development costs and values, with a sustained change in key variables enough to trigger a review of the CIL rate. In any case,

¹ Note that the comparison between the current and recommended rates is to inform the councils' decision and that the use categories for the current CIL and recommended CIL may not always be exactly the same – for example the current charging schedule refers to “residential” which the council has been implementing as a C3 use, which may or may not be directly comparable with the recommendations for sheltered/extra care which may be C2 or C3.

² Rate only applies to residential development of 150 dwellings or more on strategic allocated sites.

a review should be considered in two to three years, noting that it does not have to lead to a revised charging schedule.

3. Preliminary Draft Charging Schedule consultation document

- 3.1 A Preliminary Draft Charging Schedule (PDCS) consultation document is appended to this report. This contains the charging schedule itself (i.e. the table of CIL rates), explanatory text, and maps showing the charging “zones”.
- 3.2 The CIL rate in the PDCS reflects the findings of the viability study shown in figure 1 above. It should be noted that the proposed rate should be reasonable, given the available evidence, but is not required to exactly mirror the evidence. Government guidance makes clear there is room for pragmatism, giving the example that the rate might not be appropriate if set right at the margins of viability.³ The viability study includes a 50% buffer compared to the theoretical maximum CIL rate that could be charged, so is not considered to be “right at the margins of viability”.
- 3.3 CIL regulations allow payment of the levy by instalments, defined from when development commenced. A revised draft instalment policy is presented in the PDCS consultation document. Given that small sites are generally completed (and therefore generate value) more quickly than larger sites, it is now considered reasonable to introduce thresholds for development, depending upon the amount of CIL to be paid. This would reduce administration (for the council and applicants), and also mean that the council receives CIL from the smaller schemes more quickly.

4. Next steps

- 4.1 Assuming the recommendations in this report are resolved, the Preliminary Draft Charging Schedule consultation document will be published for consultation. The CIL Regulations do not set the length of public consultation for a preliminary draft charging schedule, but a draft charging schedule (the following stage) must undergo at least four weeks of public consultation.
- 4.2 Although we would normally consult for a period of six weeks on planning policy documents, in this instance four weeks is suggested as it is a revision of an existing document, and to enable alignment with the Cranbrook Plan preparation timescale (intention for a concurrent Examination to benefit from ‘economies of scale’, as happened with the Local Plan and existing Charging Schedule), in a manner that is consistent with CIL Regulations.
- 4.3 Following public consultation on the Preliminary Draft Charging Schedule consultation document, the responses will be reviewed and consideration given to any potential changes to the document as a result. A Draft Charging Schedule will then be produced, and published for consultation for at least four weeks. At this stage, representations may request the right to be heard by the Examiner (i.e. attend hearing sessions). Consultation on a Draft Charging Schedule should take place in early summer 2019.
- 4.4 Later in the summer of 2019, it is anticipated that the Draft Charging Schedule, supporting evidence, and representations will be submitted for Examination (alongside the Cranbrook Plan).
- 4.5 All going well, it is expected that a new Charging Schedule will be adopted by the council and brought into effect in 2020.

³ Planning Practice Guidance, Reference ID: 25-019-20140612: <https://www.gov.uk/guidance/community-infrastructure-levy#Community-Infrastructure-Levy-rates>

Community Infrastructure Levy

Preliminary Draft Charging Schedule

Consultation document



February 2019.

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1 Preliminary Draft Charging Schedule

- 1.1 Community Infrastructure Levy (CIL) is charged in pounds per square metre on the net additional increase in gross internal floor area. The amount to be charged is calculated in accordance with Regulation 40 in the CIL Regulations 2010 (as amended).
- 1.2 The proposed rate of CIL that is being published for consultation in this Preliminary Draft Charging Schedule is set out in figure 1 below. Chapter 3 contains maps of the CIL charging zones that show the areas within which the charges apply.

Figure 1: Preliminary Draft Charging Schedule

Type of development	Rate (£ per square metre)
All development at Cranbrook	£0
General residential development in Sidmouth and Budleigh Salterton	£200
General residential development in the rest of East Devon	£150
Sheltered housing, extra care housing and care homes ¹	£0
Rural Exception Sites	£0
Strategic allocated sites ² in East Devon	£100

¹ Retirement housing - This is often known as “Sheltered Housing” or “Retirement Living”. Retirement Housing usually provides some facilities that you would not find in completely independent accommodation. These can include (secure main entrance, residents’ lounge, access to an emergency alarm service, a guest room. Extra facilities and services are paid for through a service charge on top of the purchase price or rent. To move into retirement housing, occupants are assumed to be independent enough not to need care staff permanently on site.

Supported housing - This is often known as “Extra Care Housing” or “Assisted Living”. Everyday care and support will be available. Facilities will include those available in retirement housing plus others (such as a restaurant, communal lounges, social space and leisure activities, staff on site 24 hours a day). Service charges are likely to be higher than in retirement housing but this reflects the more extensive range of facilities.

‘Care homes’ are defined as residential care homes or nursing homes where integral 24 hour personal care and/or nursing care are provided together with all meals. A care home is typically a residential setting where a number of older people live, usually in single rooms and people occupy under a licence agreement.

² Rate only applies to residential development of 150 dwellings or more on strategic sites allocated in the Local Plan.

Type of development	Rate (£ per square metre)
Retail (out of town centre) ³	£84
All other non-residential uses	£0

³ Applies to qualifying floor space outside of Town Centre Shopping Areas as defined in the East Devon Local Plan 2013 to 2031, and to all retail development within planning use class 'A'.

2 Explanatory text

Introduction

- 2.1 The Community Infrastructure Levy (CIL) is a tool to help deliver infrastructure to support development. CIL is payable on development that creates net additional floor space, expressed as pounds per square metre. However, there are several exemptions which mean that some development will not need to pay CIL.⁴ Government guidance explains what CIL is and how it operates.⁵ Guidance on the council operate CIL is available on our website.⁶
- 2.2 The rate of CIL is set out in a “charging schedule”. East Devon District Council is a “charging authority” and adopted its charging schedule in April 2016, and has been charging CIL on new development approved since 1 September 2016. The current charging schedule includes a CIL charge for residential and retail development.⁷ There are three ‘zones’ for residential development, with differing CIL rates; whilst only retail development outside town centre shopping areas and Cranbrook needs to pay CIL.
- 2.3 The “regulation 123 list” sets out those projects or types of infrastructure that the council intends to fund, or may fund, through the levy⁸ - as noted later, the Government propose removing these lists.
- 2.4 The council is revising its charging schedule to reflect updated national policy and guidance, latest evidence on development costs and values in the district, and to align with development being proposed in the emerging Cranbrook Plan.
- 2.5 This Preliminary Draft Charging Schedule is the first consultation stage in revising the charging schedule.⁹ Future stages may take place under amended CIL regulations – if this

⁴ Exemptions include: development of less than 100 sq m (apart from new dwellings), dwellings built by ‘self builders’, residential annexes and extensions, social housing, charitable development, and vacant buildings brought back into the same use.

⁵ Community Infrastructure Levy Planning Practice Guidance, Ministry of Housing, Communities and Local Government: <https://www.gov.uk/guidance/community-infrastructure-levy>

⁶ East Devon District Council Community Infrastructure Levy guide: <http://eastdevon.gov.uk/planning/planning-services/planning-development-management/community-infrastructure-levy-cil/>

⁷ East Devon District Council Community Infrastructure Levy Charging Schedule, April 2016: <http://eastdevon.gov.uk/media/1680258/adopted-charging-schedule.pdf>

⁸ The current adopted Regulation 123 list can be seen here: <http://eastdevon.gov.uk/media/1680413/adopted-reg-123-list.pdf>

⁹ The council is aware that draft CIL regulations remove the requirement for consultation on a preliminary draft charging schedule, but this process cannot be followed until the final regulations are published.

is the case, the council will follow provisions that will enable a transition into any new process for preparing charging schedules.¹⁰

Consultation details

- 2.6 In accordance with CIL Regulation 15,¹¹ this Preliminary Draft Charging Schedule is being published for consultation from xx February to xx xxxx 2019. Consultation responses must be submitted in writing by email to planningpolicy@eastdevon.gov.uk or by post to Planning Policy, East Devon District Council, Blackdown House, Border Road, Heathpark Industrial Estate, Honiton EX14 1EJ. Responses will usually be made public on our website, subject to redaction of some personal information and any inappropriate content. Further detail, including information on data protection, can be seen on the consultation web page: **INSERT WEB LINK**

Background evidence

- 2.7 In setting a CIL rate, the council must strike an appropriate balance between:
- The desirability of funding from CIL (in whole or part) the estimated cost of infrastructure required to support the development of its area, taking into account other funding sources; and
 - The potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area.¹²
- 2.8 Regarding point a), the scale, type and location of future development in East Devon is set out in the adopted East Devon Local Plan 2013 to 2031.¹³ In addition, the emerging Cranbrook Plan outlines how this town will develop, allocating land for its future growth. The infrastructure requirements to support this development are detailed in the Infrastructure Delivery Plan (IDP),¹⁴ with further, updated information in the Cranbrook Plan itself.¹⁵ The IDP identifies a significant infrastructure cost of some £350m to deliver the Local Plan and emerging Cranbrook Plan, with a funding gap of £270.9m. It was previously estimated (based upon the currently adopted CIL charging schedule) that CIL would generate £30.8m

¹⁰ Draft amended CIL regulations were subject to a technical consultation from December 2018 – January 2019. Draft Regulation 16 sets out transitional provisions:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/767292/CIL_Amendment_Regulations_Consultation_Paper.pdf

¹¹ The Community Infrastructure Levy Regulations 2010 (as amended), Regulation 15:

<https://www.legislation.gov.uk/uksi/2010/948/contents/made>

¹² The Community Infrastructure Levy Regulations 2010 (as amended), Regulation 14:

<https://www.legislation.gov.uk/uksi/2010/948/contents/made>

¹³ East Devon Local Plan 2013 to 2031, adopted January 2016: <http://eastdevon.gov.uk/planning/planning-policy/local-plan-2013-2031/>

¹⁴ East Devon Infrastructure Delivery Plan review (November 2017): http://eastdevon.gov.uk/media/2270747/idp-review-2017_report.pdf

¹⁵ The infrastructure requirements for the 'publication' Cranbrook Plan are detailed in the accompanying viability study, chapter 6: **INSERT WEB LINK**

for the council to spend on infrastructure over the Local Plan period – this figure is likely to be lower in the future if, as proposed, development at Cranbrook is not charged CIL. These figures demonstrate the need to levy CIL.

- 2.9 For point b), the potential effects of CIL on the economic viability of development is considered in detail in the accompanying viability assessment.¹⁶ This study assesses the viability of typical sites envisaged to come forward, considering Local Plan policy requirements and other costs (as well as providing a viability assessment of the Cranbrook Plan). This has informed a recommendation on the amount of CIL that residential and non-residential development can support, including whether there are differences in viability across East Devon or between different types of development that are sufficient to justify different CIL rates.
- 2.10 In general, the viability study recommends an increase in residential CIL rates compared to the current adopted charging schedule (as indexed), although rates are still comfortably within the viability headroom. The exception is Cranbrook, which is not able to support CIL due to the level of section 106 planning obligations and other costs associated with that development. Outside Cranbrook, the study recommends differing charging zones for general residential development at Sidmouth and Budleigh Salterton (£200 per square metre), and elsewhere (£150 per square metre). This rate reduces for strategic allocated sites, due to additional infrastructure costs provided through section 106 planning obligations. It is recommended that CIL is not charged on rural exception sites, to reduce the level of market housing that may be required to subsidise the provision of affordable housing. CIL is also not viable for sheltered housing, extra care housing and care homes.
- 2.11 For non-residential development, the evidence shows that only retail development would be viable with CIL, but at a lower rate than the current charging schedule due to a weaker retail sector than previously. It is recommended that the rate applies to all retail development within use class A and outside of town centres. As already noted, all development at Cranbrook, including retail, would not be charged CIL.
- 2.12 The viability study considers a range of other non-residential uses, noting that most share similar characteristics for the purposes of viability so are covered by the same rate. A couple of examples to highlight given the characteristics of East Devon are farm shops and holiday accommodation. Farm shops and garden centres are considered to be out of centre retail, meaning that small-scale ventures using existing buildings would not be liable for CIL, but larger complexes in new permanent buildings would pay the out of centre retail rate. The rate for holiday accommodation will depend on whether it is a standard dwelling that the purchaser intends will be used for holiday accommodation (standard residential charge), or on a holiday park which will be part of all other non-residential uses category with no CIL charge.

¹⁶ CIL Review and Cranbrook DPD viability study, Three Dragons with Ward Williams Associates, January 2019:
[INSERT WEB LINK](#)

2.13 The recommendations from the viability assessment are reflected in the [preliminary draft charging schedule](#) in chapter 1.

Instalment policy (phased payments)

2.14 CIL regulations¹⁷ allow payment of the levy by instalments, defined from when development has commenced. This can assist the viability and delivery of development, as in most cases developments only generate value when they are complete (in whole or in phases).¹⁸ Where no instalment policy is in place, the full amount of CIL is due 60 days after development has commenced.

2.15 The current instalment policy (known as “phased payment policy”) requires payment in five instalments, regardless of the total CIL liability,¹⁹ with three instalments of 10% over the first year, 30% within 540 days, and the remaining 40% within 720 days. As there are no thresholds for the CIL liability, it means that developments with a relatively small amount of CIL to pay (e.g. for a single dwelling) are subject to the same proportions as those with a large liability (e.g. several hundred dwellings).

2.16 Given that small sites are generally completed (and therefore generate value) more quickly than larger sites, the council now consider it is reasonable to introduce thresholds for development, depending upon the amount of CIL to be paid (the “liability”). This would reduce administration (for the council and applicants), and also mean that the council receives CIL from the smaller schemes more quickly.

2.17 Therefore, a revised instalment policy is presented for consultation below (figure 2).

Figure 2: Draft Instalment policy

Total CIL liability	Number of instalments	Amount payable	Payment period (due from commencement)
Less than £15,000	1	100%	90 days
Between £15,000 and £75,000	2	50% 50%	90 days 180 days
Between £75,001 and £300,000	3	25% 25% 50%	90 days 180 days 360 days

¹⁷ The Community Infrastructure Levy Regulations 2010 (as amended), Regulation 69B.

¹⁸ Planning Practice Guidance 25-055-20140612: <https://www.gov.uk/guidance/community-infrastructure-levy#spending-the-levy>

¹⁹ East Devon CIL Phased Payment Policy, August 2016: <http://eastdevon.gov.uk/media/1879937/phased-payment-policy.pdf>

Total CIL liability	Number of instalments	Amount payable	Payment period (due from commencement)
Between £300,001 and £800,000	3	25% 25% 50%	180 days 360 days 540 days
Over £800,000	4	20% 20% 20% 40%	180 days 360 days 540 days 720 days

Government consultation on removing regulation 123 lists and the pooling restriction

- 2.18 The current CIL regulations require charging authority's to prepare a list of those projects or types of infrastructure that it intends to fund, or may fund, through the levy (the "regulation 123 list") – anything on this list cannot be funded through section 106 contributions. However, draft regulations²⁰ remove regulation 123 lists, and instead require local authorities to prepare an annual Infrastructure Funding Statement by 31 December each year. This statement will set out how developer contributions have been spent, and anticipated revenue and spend for future years.
- 2.19 In addition, the draft regulations remove the pooling restriction that prevent local authorities from using more than five section 106 obligations for a single infrastructure project. This will allow local authorities to use both CIL and section 106 to fund the same item of infrastructure, providing greater funding flexibility in relation to infrastructure delivery.
- 2.20 The council are working on the basis that revised CIL regulations will be published in due course, which will confirm the removal of regulation 123 lists and the section 106 pooling restriction as proposed in the draft regulations. Therefore, we have not proposed a revision of the regulation 123 list for this consultation.

Next steps

- 2.21 Following this consultation on the Preliminary Draft Charging Schedule, responses will be considered and used to inform a draft charging schedule that should be published for consultation in early summer 2019. The Draft Charging Schedule will then be submitted for Examination by an independent inspector, who will assess the schedule and accompanying evidence, before it can be adopted and brought into effect.

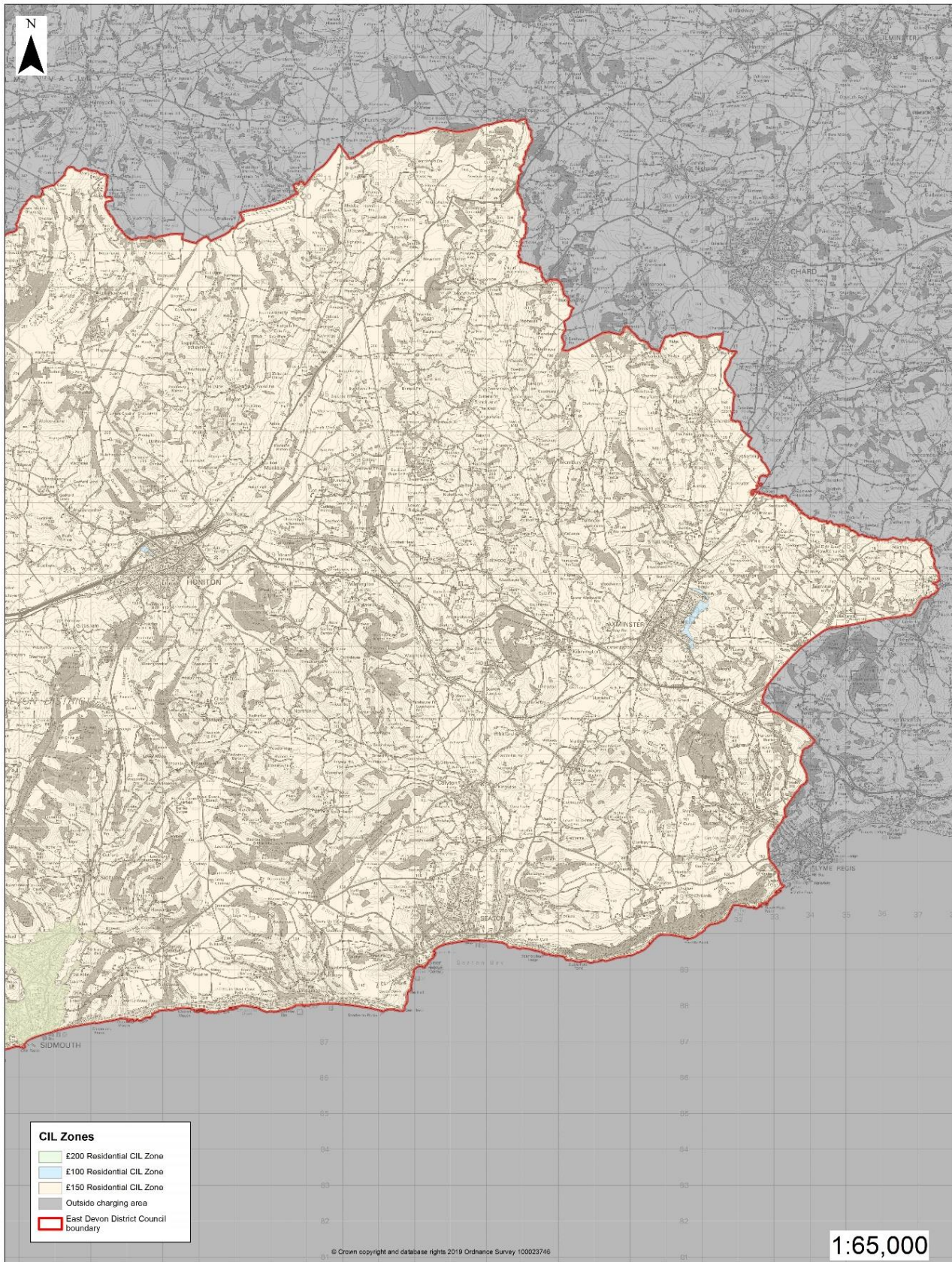
²⁰ Reforming developer contributions – technical consultation on draft regulations, Ministry of Housing, Communities and Local Government, December 2018:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/767292/CIL_Amendment_Regulations_Consultation_Paper.pdf

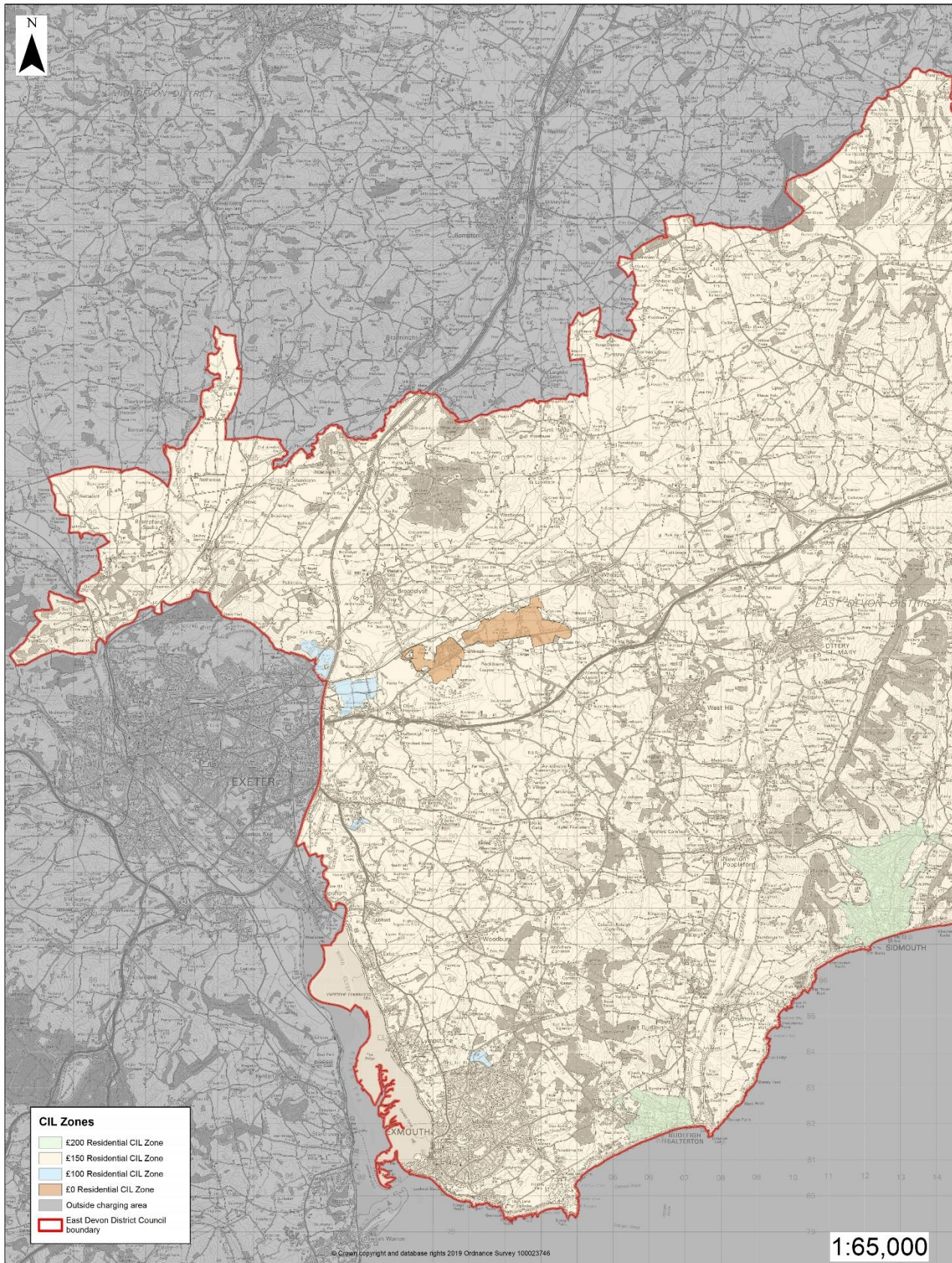
3 Maps of Charging Zones

3.1 The following pages show a series of maps with the CIL charging zones for residential and retail development across East Devon. The maps are ordered as follows:

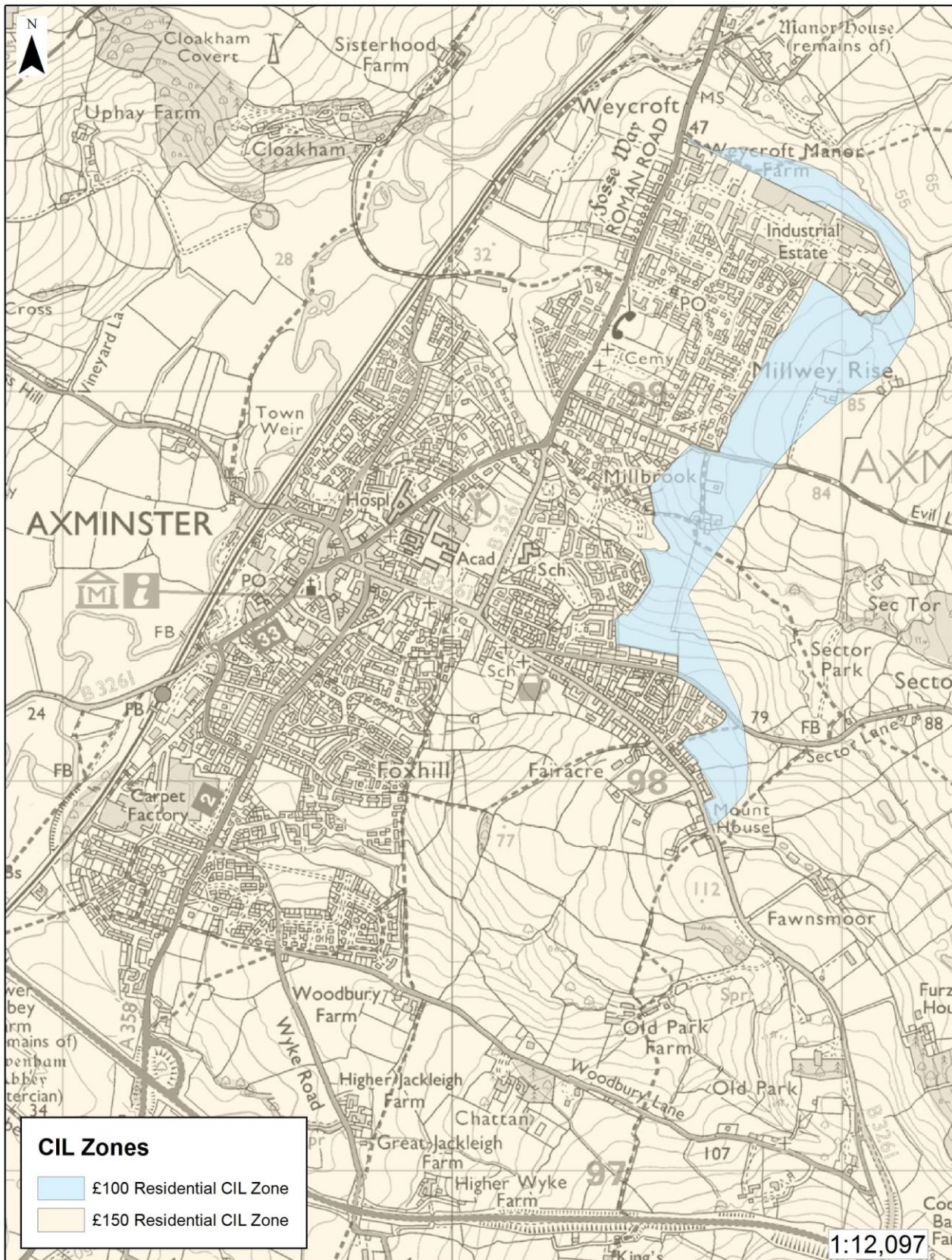
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- West of District – Residential CIL charging zones
- Axminster – Residential CIL charging zones
- Budleigh Salterton – Residential CIL charging zones
- Cranbrook – Residential CIL charging zones
- Edge of Exeter – Residential CIL charging zones
- Exmouth – Residential CIL charging zones
- Honiton – Residential CIL charging zones
- Ottery St Mary – Residential CIL charging zones
- Seaton – Residential CIL charging zones
- Sidmouth – Residential CIL charging zones
- East of District – Retail CIL charging zones
- West of District – Retail CIL charging zones
- Axminster – Retail CIL charging zones
- Beer – Retail CIL charging zones
- Budleigh Salterton – Retail CIL charging zones
- Colyton – Retail CIL charging zones
- Cranbrook – Retail CIL charging zones
- Exmouth – Retail CIL charging zones
- Honiton – Retail CIL charging zones
- Ottery St Mary – Retail CIL charging zones
- Seaton – Retail CIL charging zones
- Sidmouth – Retail CIL charging zones



East of District - Residential CIL charging zones



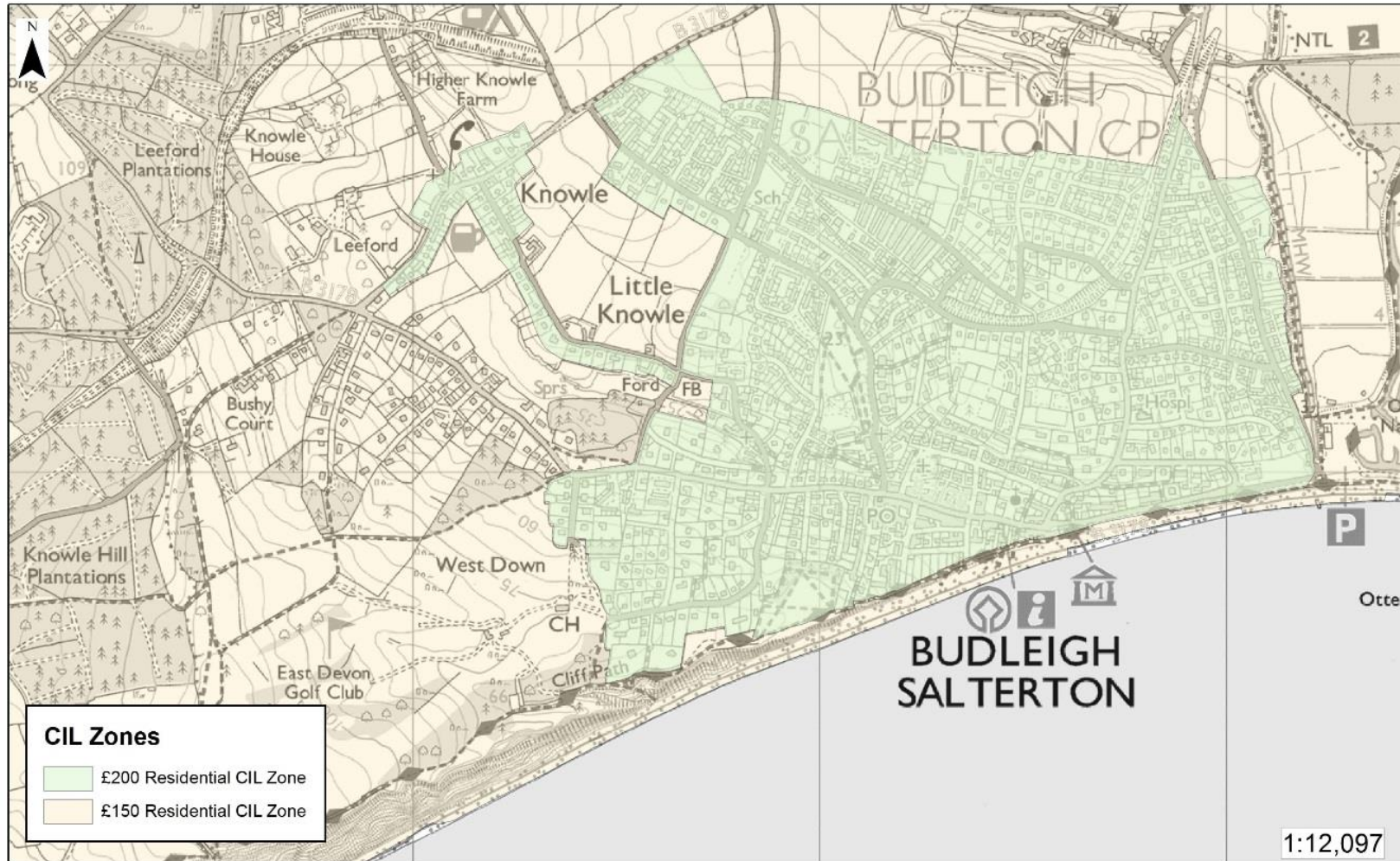
West of District - Residential CIL charging zones



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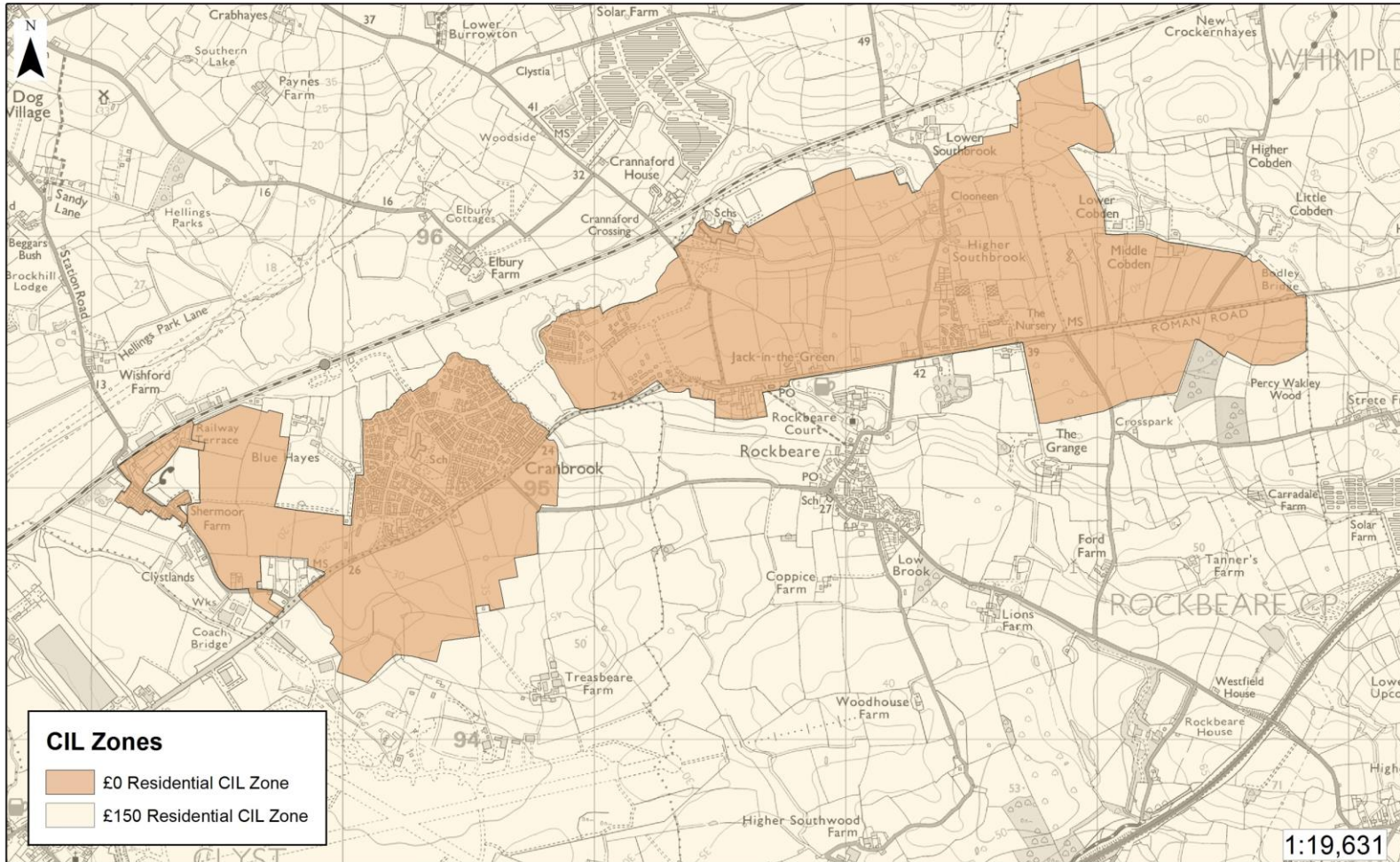
Axminster - Residential CIL charging zones

Budleigh Salterton - Residential CIL charging zones



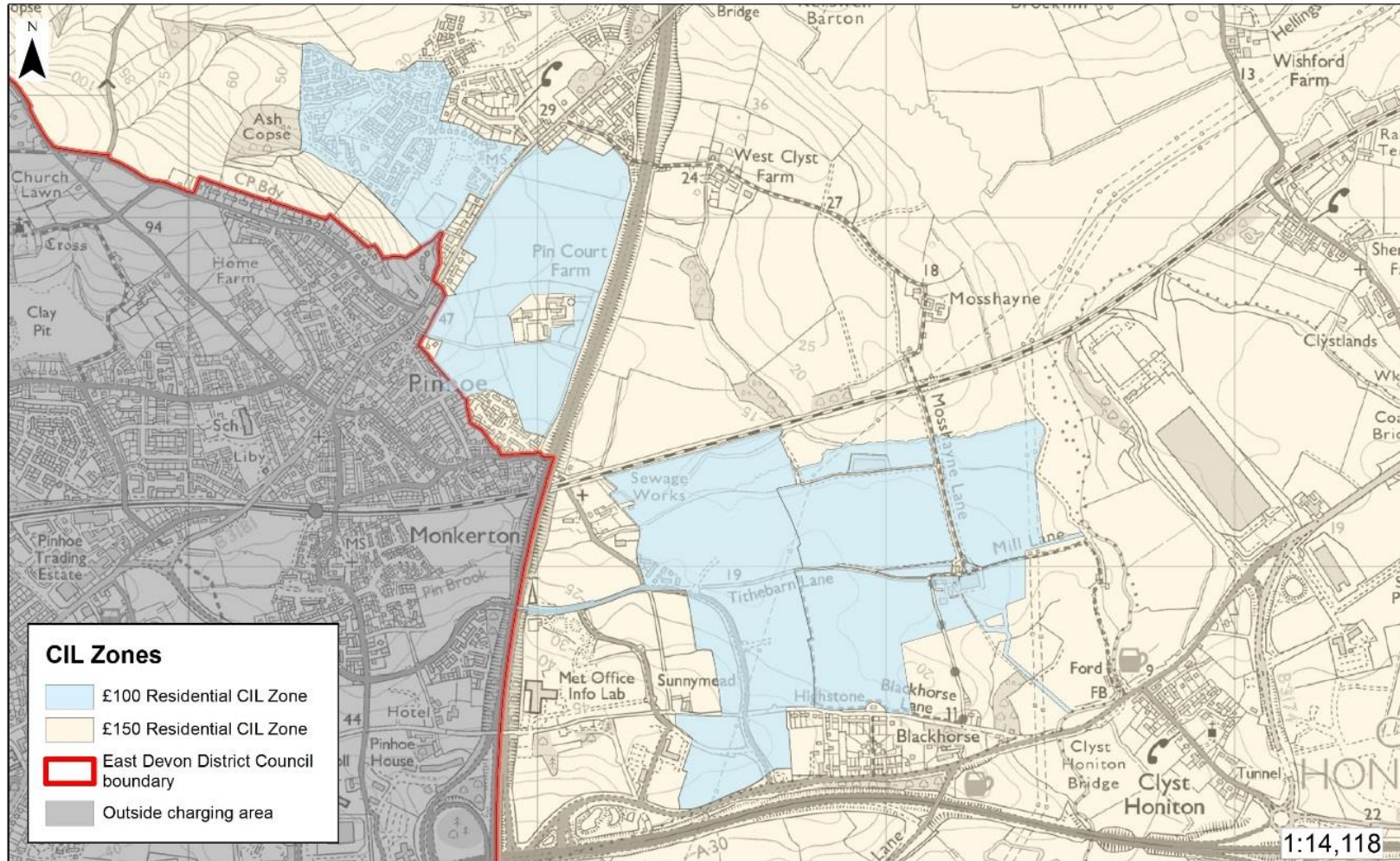
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Cranbrook - Residential CIL charging zones



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Edge of Exeter - Residential CIL charging zones



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Exmouth - Residential CIL charging zones

Honiton - Residential CIL charging zones



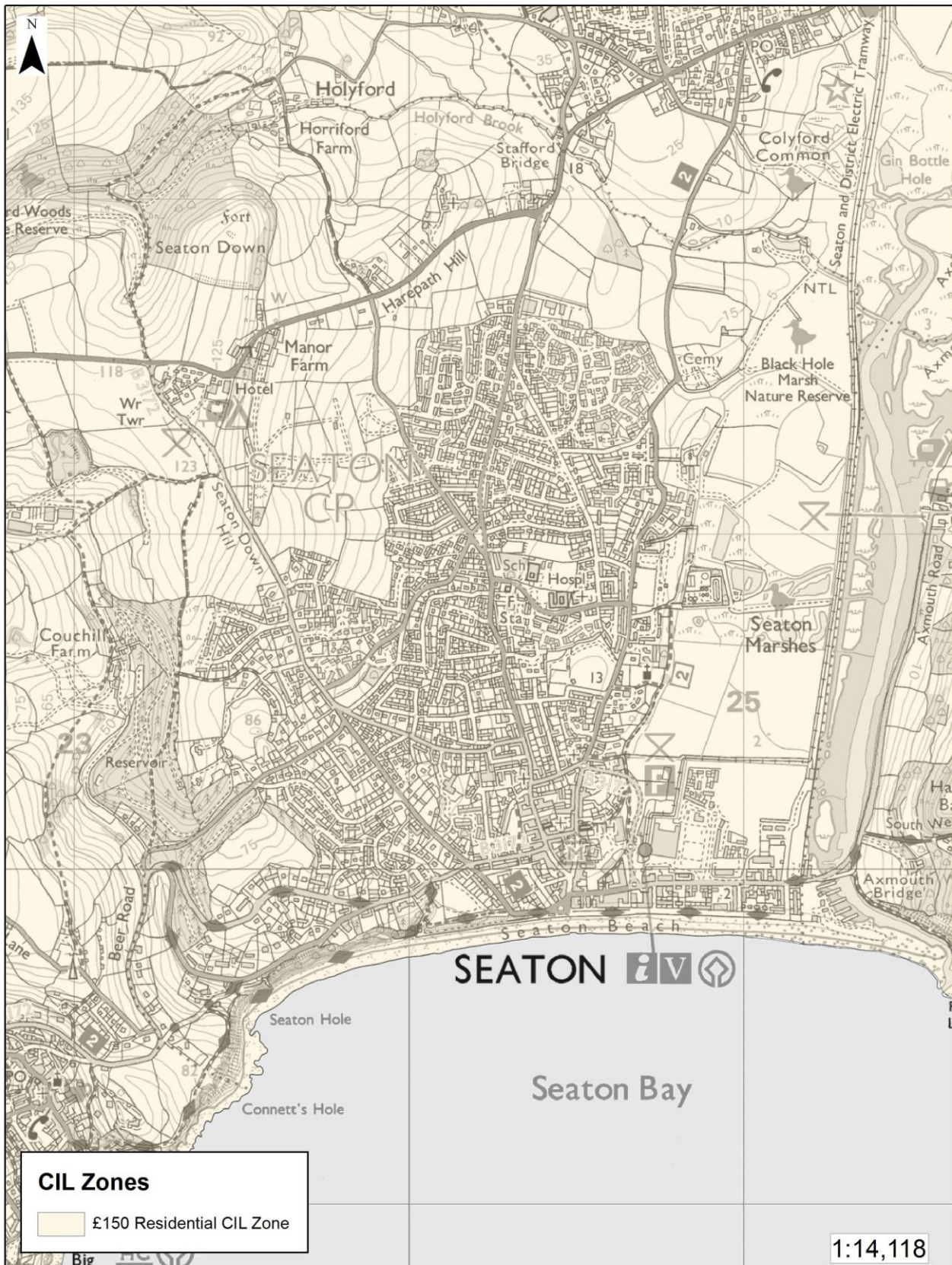
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Ottery St Mary - Residential CIL charging zones



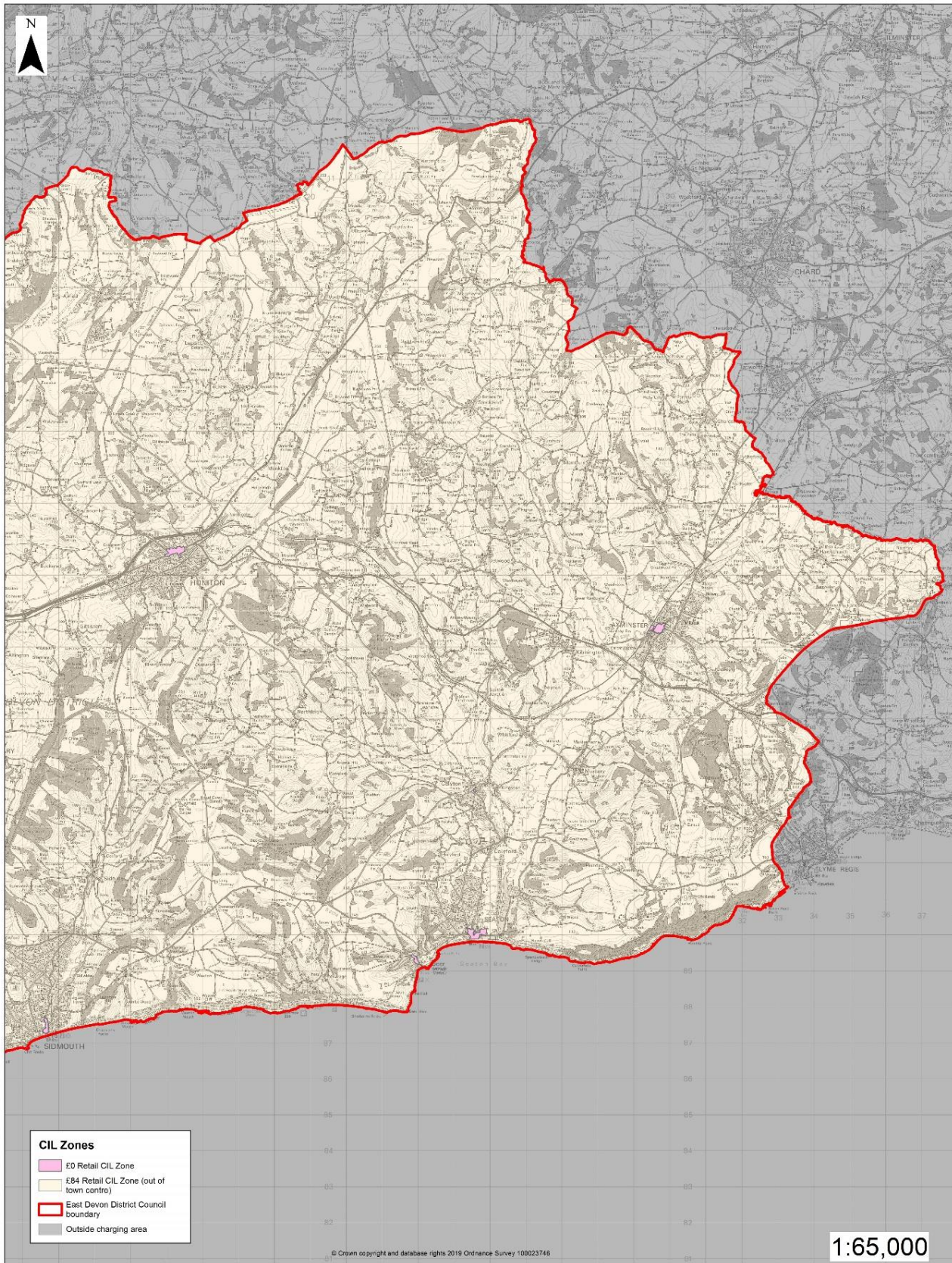
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Seaton - Residential CIL charging zones

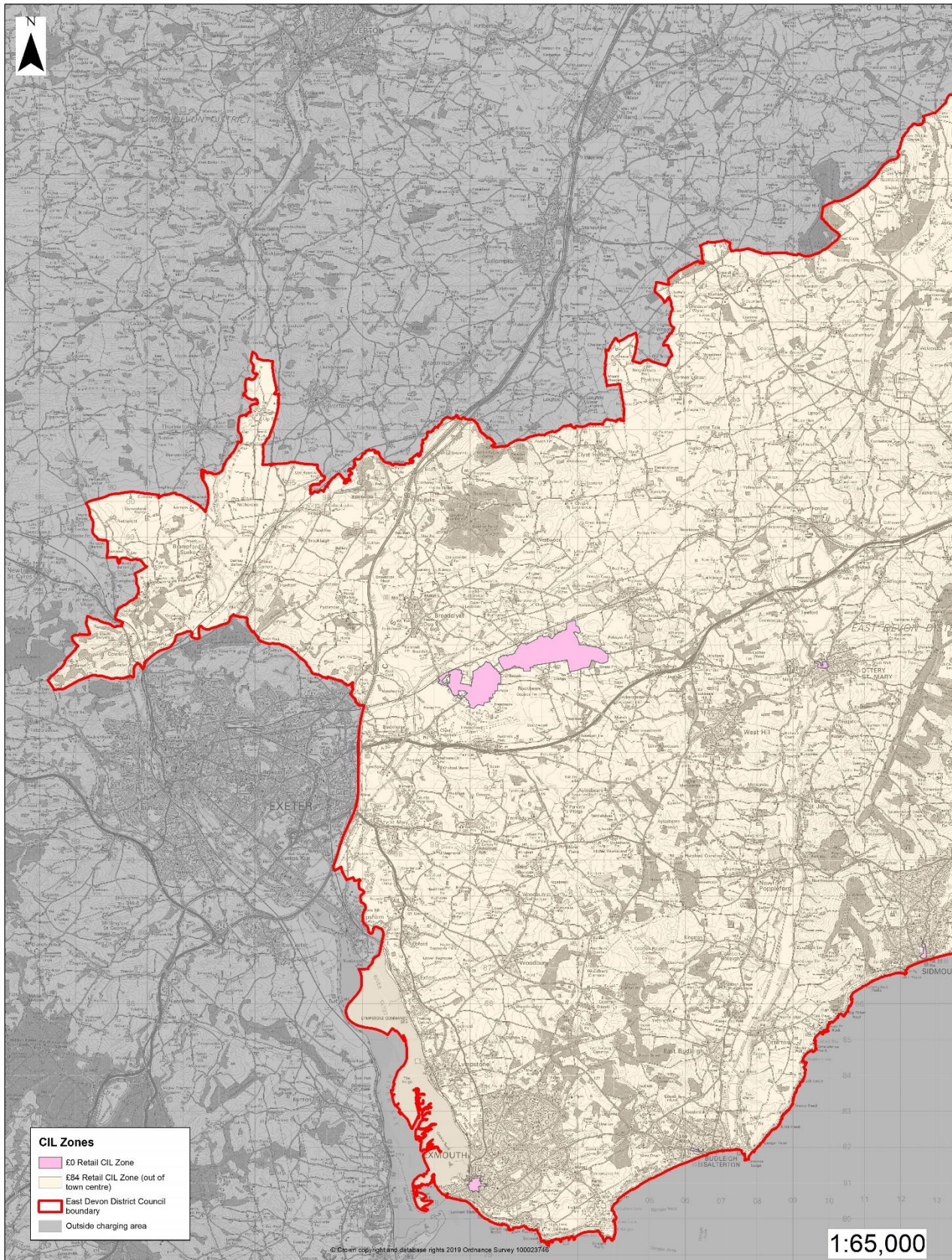


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Sidmouth - Residential CIL charging zones

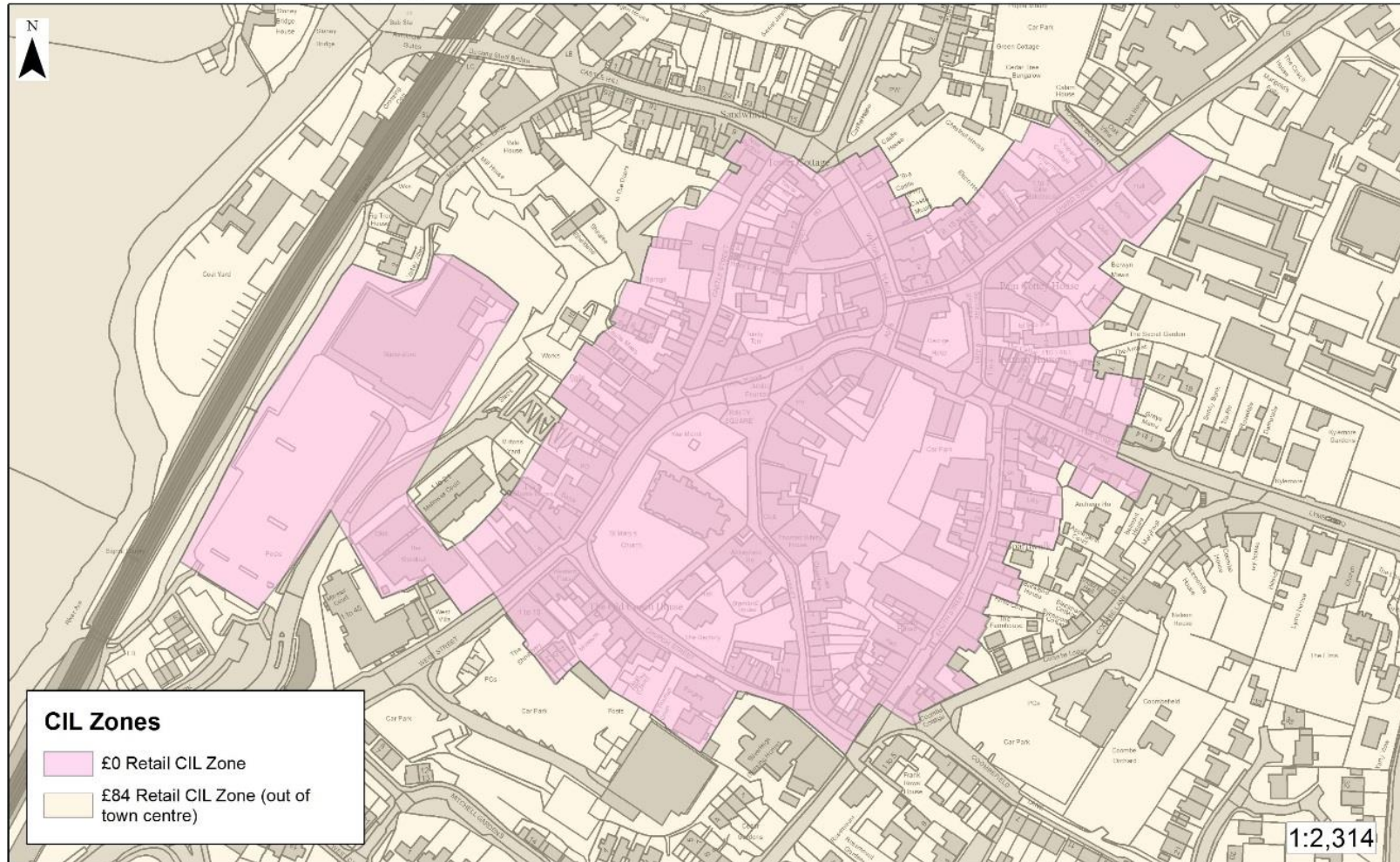


East of District - Retail CIL charging zones



West of District - Retail CIL charging zones

Axminster - Retail CIL charging zones



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Beer - Retail CIL charging zones



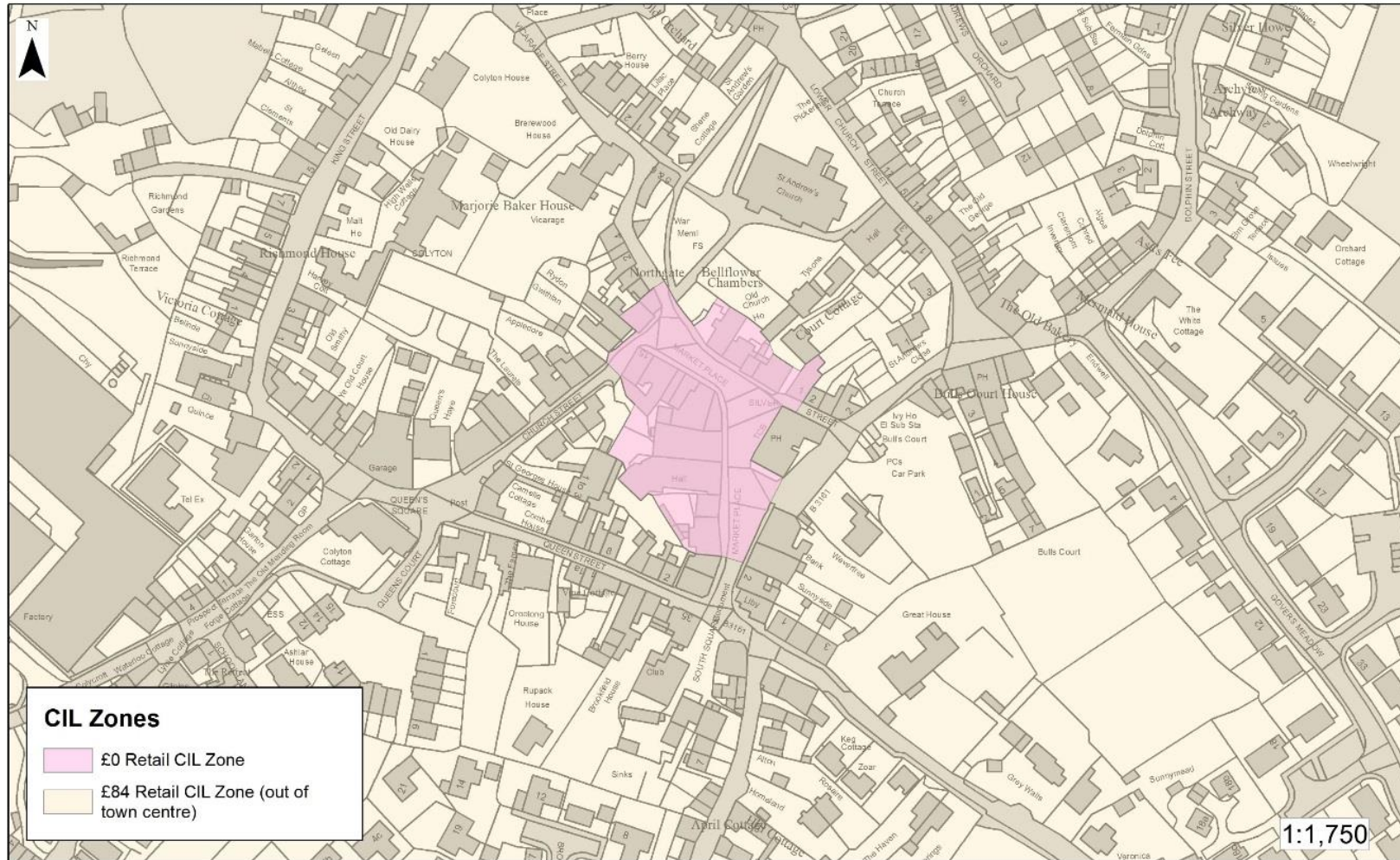
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Budleigh Salterton - Retail CIL charging zones



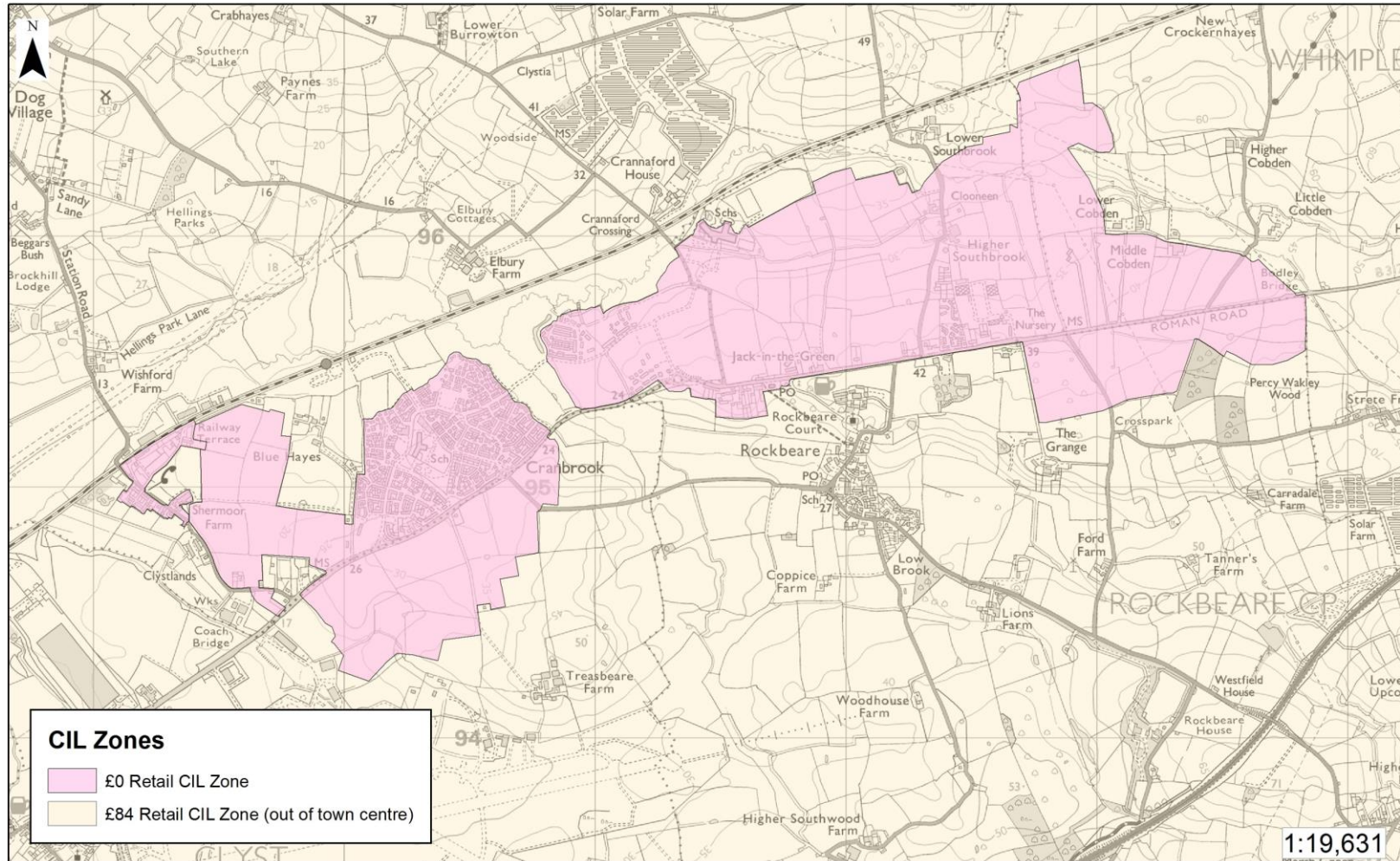
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Colyton - Retail CIL charging zones



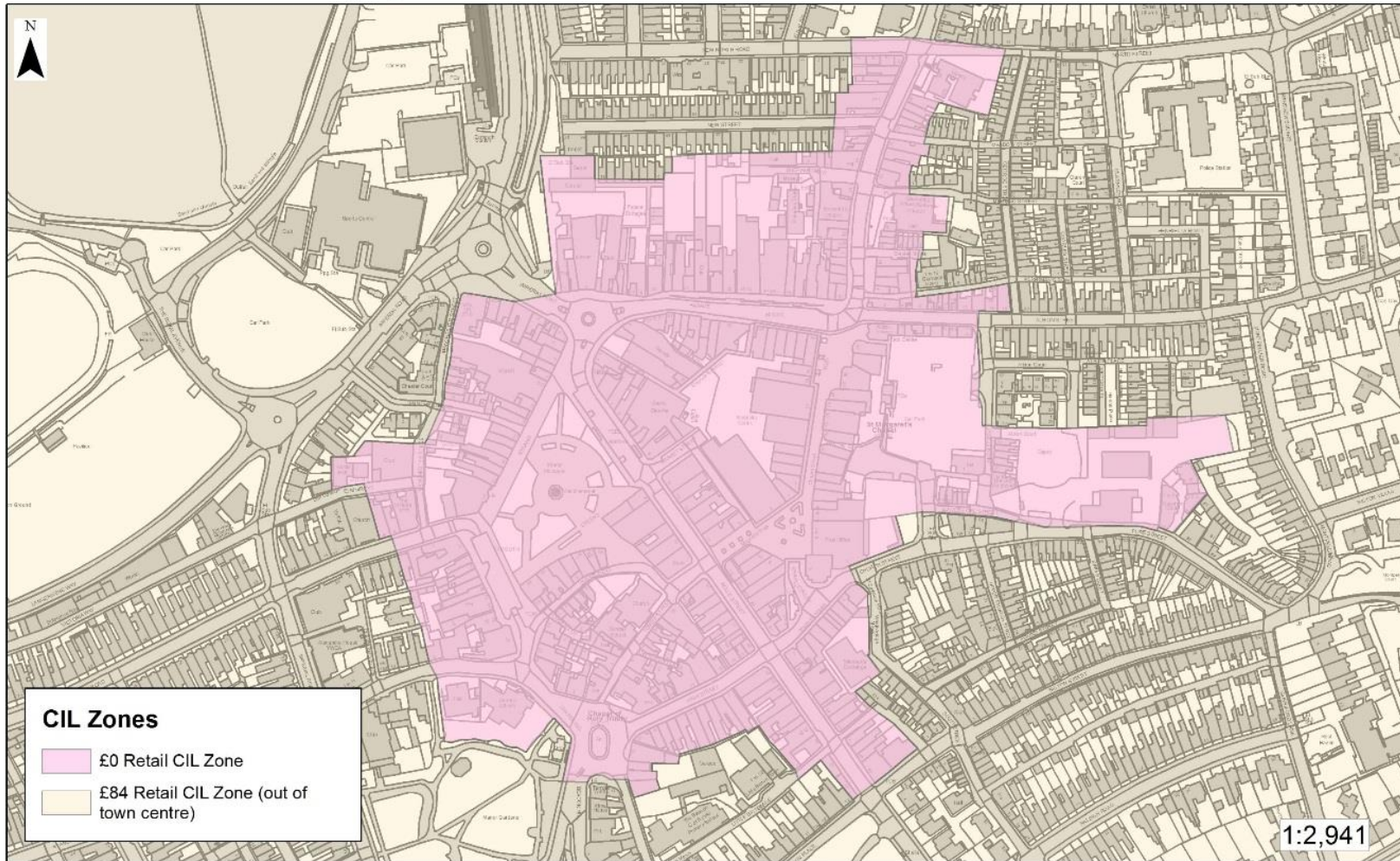
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Cranbrook - Retail CIL charging zones



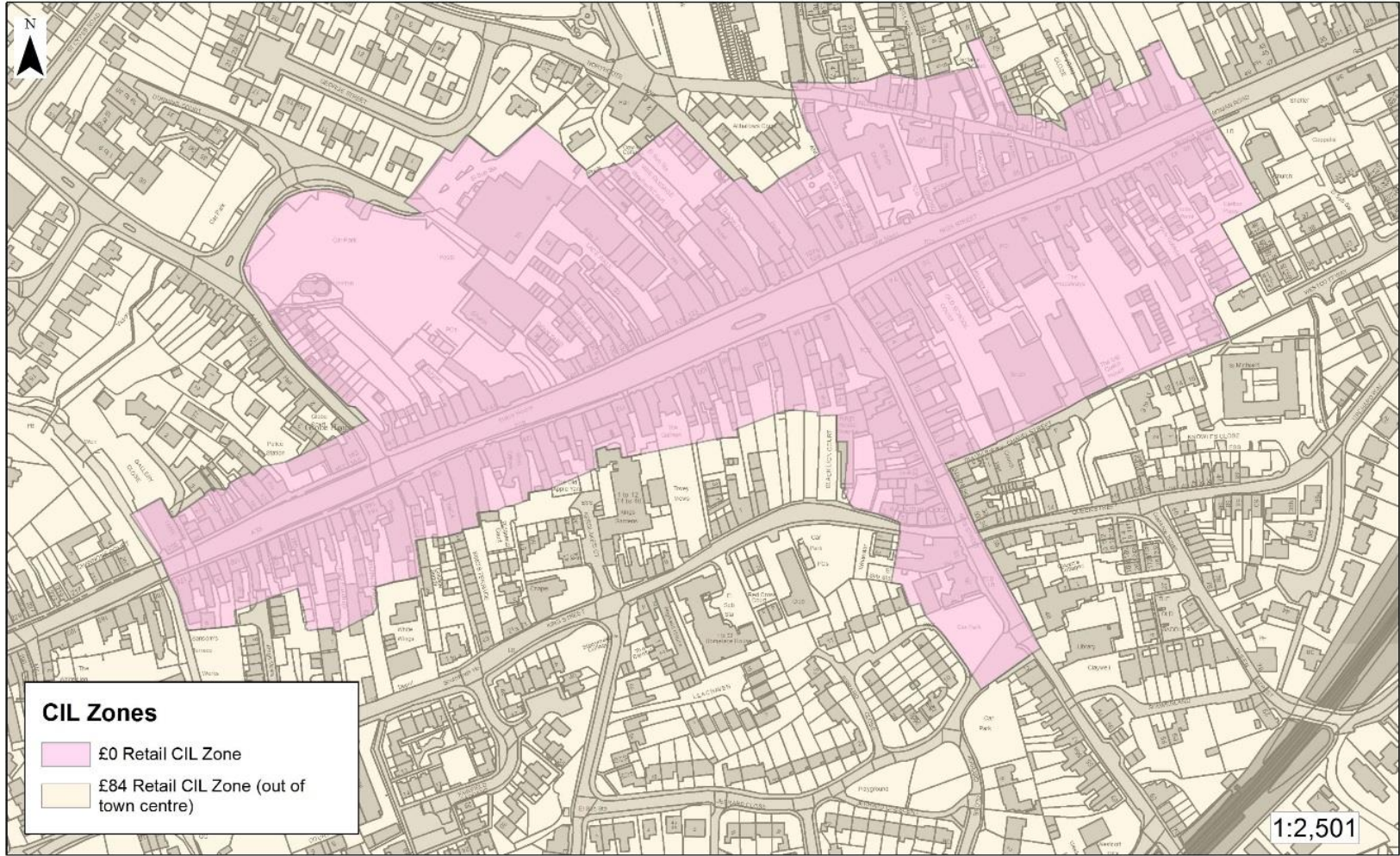
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Exmouth - Retail CIL charging zones



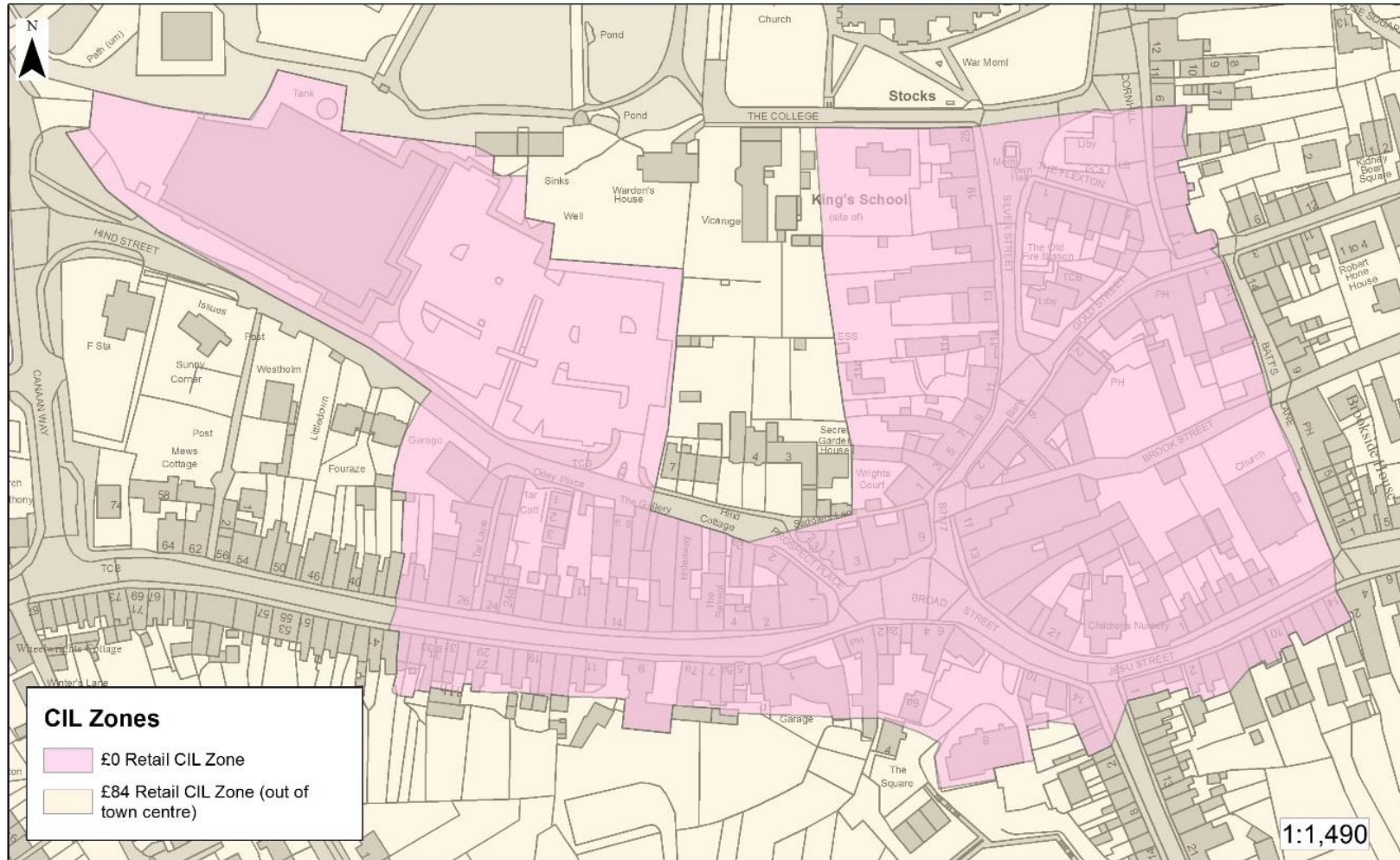
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Honiton - Retail CIL charging zones



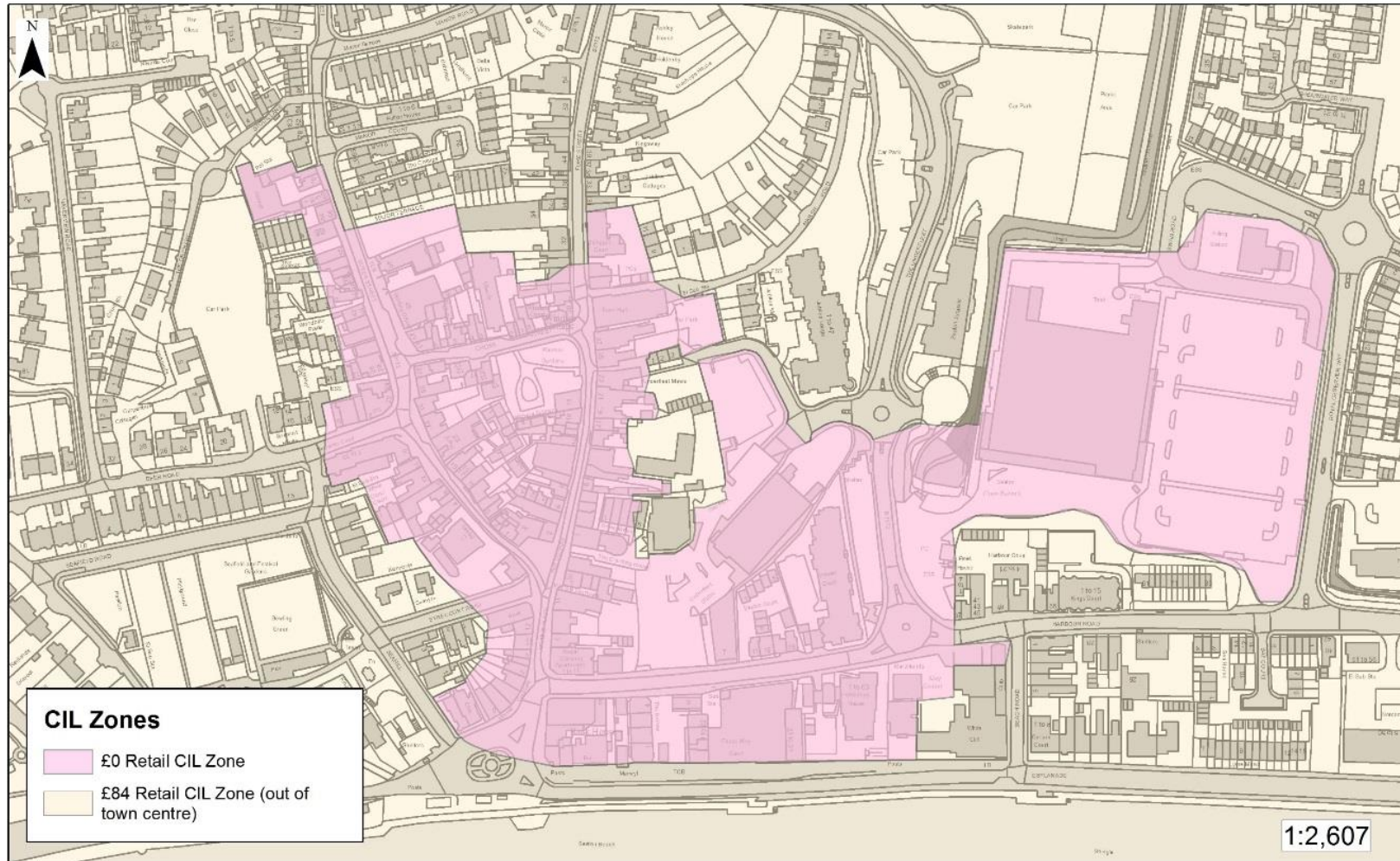
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Ottery St Mary - Retail CIL charging zones



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Seaton - Retail CIL charging zones



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Sidmouth - Retail CIL charging zones



**East Devon District
Council**

**CIL Review and
Cranbrook Plan DPD
Viability Study**

January 2019

**Three Dragons with
Ward Williams
Associates**



This report is not a formal land valuation or scheme appraisal. It has been prepared using the Three Dragons Toolkit and is based on district level data supplied by East Devon Council, consultation and quoted published data sources. The toolkit provides a review of the development economics of illustrative schemes and the results depend on the data inputs provided. This analysis should not be used for individual scheme appraisal.

No responsibility whatsoever is accepted to any third party who may seek to rely on the content of the report unless previously agreed.

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ANNEXES

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ANNEX H Residential Appraisal Summaries

ANNEX I Cranbrook Cost Plan

EXECUTIVE SUMMARY

1. Three Dragons with Ward Williams Associates were commissioned by East Devon District Council to undertake a viability assessment at a strategic level and provide the following outputs:
 - Viability assessment of typical sites, considering the Local Plan requirements and other costs, to inform the reassessment of Community Infrastructure Levy (CIL) rates
 - Viability assessment of Cranbrook expansion areas based on the draft DPD and masterplan prepared by the Council
2. The viability testing for this report has:
 - Reviewed broad costs associated with addressing policies set out in the draft Cranbrook masterplan and DPD, and the Local Plan
 - Tested the quantum and broad form of proposed development at Cranbrook, taking account of site-specific costs and values
 - Been designed to assess the amount of CIL that other residential and non-residential development can support, including whether there are differences in viability across the district or between different types of development that are sufficient to justify different CIL rates
3. Based on the viability testing and with suitable buffers and reasonable tests we have recommended a set of *general residential* CIL rates that represent an increase on the current indexed rates, but still comfortably within the viability headroom. Within this, some of the uses that were not identified in the current schedule now have lower recommended charges.
4. We have also tested the expected forms of non-residential development and this has confirmed that retail is the only type of development with enough viability to support a CIL. However, retail viability is weaker than it has been in the past and as a result the recommended rates are lower than the current indexed CIL. As before, the rates apply to out of town centre retail development.
5. Development of the expansion areas for Cranbrook has been viability tested, based on the requirements in the draft DPD and masterplan. This testing suggests that the development will be viable with a lower rate of affordable housing (15%) but will not be able to support a CIL. This CIL rate would apply to all development in Cranbrook.
6. Where larger strategic sites may have to provide additional infrastructure through s106 then the recommended CIL rates for these locations is lower than the general recommended rates. However, this lower rate is only appropriate if the government implements the proposed changes to CIL regulations and the Council wishes to fund infrastructure on strategic sites (other than Cranbrook) through s106. Alternatively, if the Council is concerned about delivery on these sites it may choose a zero or low rate for CIL, which would allow more for onsite infrastructure and other planning obligations.

7. The potential residential and non-residential CIL rates are:

Type and location of development	Proposed new CIL rate £/sq m
All development in Cranbrook	£0
General residential development in Sidmouth and Budleigh Salterton	£200
General residential development elsewhere in East Devon	£150
Sheltered housing, extracare housing and care homes in East Devon	£0
Strategic sites (allocated) with additional s106 costs in Sidmouth and Budleigh Salterton	£175
Strategic sites (allocated) with additional s106 costs elsewhere in East Devon (except Cranbrook)	£100
Retail (out of centre)	£84
All other non residential uses	£0

1 Introduction

1.1.1 Three Dragons with Ward Williams Associates were commissioned by East Devon District Council to undertake a viability assessment at a strategic level and provide the following outputs:

- Viability assessment of typical sites, considering the Local Plan requirements and other costs, to inform the reassessment of Community Infrastructure Levy (CIL) rates.
- Viability assessment of Cranbrook expansion areas to inform the preparation of the masterplan and accompanying DPD, and the Local Plan.

1.1.2 Cranbrook is a new community in East Devon close to the City of Exeter. The first 3,500 dwellings already have outline consent and around 1,800 of these have now been completed. In order to guide the next stage of development East Devon District Council has developed a masterplan and a draft DPD. The plan includes:

- 4,000 new dwellings
- Two primary schools and a Special Educational Needs school
- Two neighbourhood centres
- Employment land
- Two gypsy and traveller sites
- Open space and sports provision
- Suitable Alternative Natural Greenspace (SANGs)

1.1.3 Previous viability evidence was set out in the January 2013 East Devon Community Infrastructure Levy Viability Study¹. This covered residential and non-residential development and was examined in 2015. Since adoption in April 2016 the rates have been indexed in line with the BCIS All In Tender Price Index.

Table 1.1 East Devon Adopted CIL Charging Schedule

Residential	Original CIL £/sq m	2019 CIL £/sq m
Axminster, Cranbrook ("existing" town), Exmouth, Honiton, Ottery St Mary, Seaton and edge of Exeter allocation sites (defined by new Built-up Area Boundaries and proposed Strategic Allocations)	£80	£94.23
Allocated Cranbrook expansion areas	£68	£80.09
Sidmouth, Coast, and Rural (the rest of East Devon)	£125	£147.23
Retail		
Inside Town Centre Shopping Areas (as defined in the New Local Plan)	£0	£0
Cranbrook (as defined by the "existing town" plus expansion areas)	£0	£0
Rest of East Devon	£150	£176.67
All other Non-residential Uses		
Inside Town Centre Shopping Areas (as defined in the New Local Plan)	£0	£0
Cranbrook (as defined by the "existing town" plus expansion areas)	£0	£0
Rest of East Devon	£0	£0

¹ Three Dragons on behalf of East Devon District Council 2013

- 1.1.4 This report updates the assumptions and typologies, reflecting latest available information and where appropriate addresses points made during the consultation undertaken in 2017 and 2018.
- 1.1.5 The viability testing for this report has:
- Reviewed broad costs associated with addressing policies set out in the draft Cranbrook masterplan and DPD, and the Local Plan
 - Tested the quantum and broad form of proposed development at Cranbrook, taking account of site-specific costs and values
 - Been designed to assess the amount of CIL that residential and non-residential development can support, including whether there are differences in viability across the district or between different types of development that are sufficient to justify different CIL rates.
 - Drawn on the following for analysis:
 - A review of the types of sites planned for development in the Local Plan.
 - A review of the policies in the Local Plan and central government guidance that may have implications for development viability.
 - A review of recent developer contributions agreed by the Council as well as discussion with the Council's Development Manager and retained site specific viability consultants.
 - Desk research to form initial views on the values and costs of residential and non-residential development in East Devon and how these vary across the district.
 - Consultation with the development industry including Registered Providers, developers and agents active in the district firstly through a workshop and continued dialogue following the workshop. A note of the workshop discussions is shown at Annex 2. Subsequently we also undertook a survey of Registered Providers (RPs) to get detailed advice on the affordable housing assumptions to be used, as well as discussions with the landowners making up the expansion areas for Cranbrook.
 - Utilised the Three Dragons residential and non-residential viability models to undertake the viability testing set out in this report.

2 Requirements of viability assessment

2.1 National and local policy context

National framework

- 2.1.1 Our understanding is that for the purposes of CIL preparation the 2018 revised National Planning Policy Framework and associated revisions within the National Policy Practice Guidance will apply.
- 2.1.2 The National Planning Policy Framework (NPPF) recognises the importance of positive and aspirational planning but states that this should be done *‘in a way that is aspirational but deliverable²*.
- 2.1.3 The NPPF advises that cumulative effects of policy should not combine to render plans unviable:
‘Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.³
- 2.1.4 The government has long signalled its desire to simplify the planning process, including development contributions. The NPPF advises that:
‘All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.⁴
- 2.1.5 In terms of affordable housing the government has reiterated previous policy on affordable housing thresholds and a desire to increase affordable housing products that can potentially lead to home ownership:
‘Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount⁵
‘Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.⁶

² MHCLG, 2018 NPPF Para 16

³ MHCLG, 2018 NPPF Para 34

⁴ MHCLG, 2018 NPPF Para 57

⁵ MHCLG, 2018 NPPF Para 63

⁶ MHCLG, 2018 NPPF Para 64

- 2.1.6 With regard to non-residential development, the NPPF states that local planning authorities should:

*'set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth...local policies for economic development and regeneration...seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment...be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.'*⁷

- 2.1.7 Note the NPPF does not state that all sites must be viable now in order to appear in the plan. Instead, the NPPF is concerned to ensure that the bulk of the development is not rendered unviable by unrealistic policy costs. It is important to recognise that economic viability will be subject to economic and market variations over the local plan timescale. In a free market, where development is largely undertaken by the private sector, the local planning authority can seek to provide suitable sites to meet the needs of sustainable development. It is not within the local planning authority's control to ensure delivery actually takes place; this will depend on the willingness of a developer to invest and a landowner to release the land. So, in considering whether a site is deliverable now or developable in the future, we have taken account of the local context to help shape our viability assumptions.

Planning Practice Guidance

- 2.1.8 Planning Practice Guidance⁸ (PPG) provides further detail about how the NPPF should be applied. PPG contains general principles for understanding viability (also relevant to CIL viability). The approach taken reflects the latest version of PPG, which was updated in July 2018. In order to understand viability, a realistic understanding of the costs and the value of development is required and direct engagement with development sector may be helpful⁹. Evidence should be proportionate to ensure plans are underpinned by a broad understanding of viability, with further detail where viability may be marginal or for strategic sites with high infrastructure requirements¹⁰. However not every site requires testing and site typologies may be used to determine policy¹¹.
- 2.1.9 Generally, values should be based on comparable, market information, using average figures and informed by specific local evidence¹². For an area wide viability assessment, such as CIL, a broad assessment of costs is required, based on robust evidence which is reflective of local market conditions. All development costs should be taken into account, including within setting of benchmark land values, in particular para 011 within the PPG Viability section states that:

'Costs include:

- build costs based on appropriate data, for example that of the Building Cost Information Service

⁷ MHCLG, 2018 NPPF, para 81

⁸ MHCLG, Planning Practice Guidance

⁹ PPG Paragraph: 001 Reference ID: 10-001-20180724

¹⁰ PPG Paragraph: 004 Reference ID: 10-004-20180724

¹¹ PPG Paragraph: 002 Reference ID: 10-002-20180724

¹² PPG Paragraph: 010 Reference ID: 10-010-20180724

- abnormal costs, including those associated with treatment for contaminated sites or listed buildings, or costs associated with brownfield, phased or complex sites. These costs should be taken into account when defining benchmark land value
- site-specific infrastructure costs, which might include access roads, sustainable drainage systems, green infrastructure, connection to utilities and decentralised energy. These costs should be taken into account when defining benchmark land value
- the total cost of all relevant policy requirements including contributions towards affordable housing and infrastructure, Community Infrastructure Levy charges, and any other relevant policies or standards. These costs should be taken into account when defining benchmark land value
- general finance costs including those incurred through loans
- professional, project management, sales, marketing and legal costs incorporating organisational overheads associated with the site. Any professional site fees should also be taken into account when defining benchmark land value
- explicit reference to project contingency costs should be included in circumstances where scheme specific assessment is deemed necessary, with a justification for contingency relative to project risk and developers return'

2.1.10 Land values¹³ should be defined using a benchmark land value that is established on the basis of Existing Use Value plus a premium for the landowner. The premium should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The benchmark should reflect the implications of abnormal costs, site specific infrastructure and fees. It should be informed by market evidence including current costs and values but that this should be based on development that is compliant with policies, where evidence is not available adjustments should be made to reflect policy compliance.

2.1.11 PPG states that developer return should be 15 – 20% of gross development value and that where affordable housing is provided a lower figure is more appropriate¹⁴.

2.1.12 PPG identifies circumstances where contributions for affordable housing and s106 obligations should not be sought¹⁵. These circumstances include developments of 10-units or less with GIA of no more than 1000sq m (more than 5 units in rural areas) and custom & self-build (see also NPPF paragraph 63 reviewed earlier).

2.1.13 CIL is payable on development which creates net additional floor space, where the gross internal area of new build exceeds 100 square metres (this limit does not apply to new houses or flats)¹⁶. Custom & self-build is exempt, along with affordable housing, charitable development, buildings into which people do not normally go and vacant buildings brought back into the same use¹⁷.

2.1.14 CIL rates should be set so that they do not threaten the viability of the sites and scale of development identified in the Local Plan¹⁸. Instead an appropriate balance should be set

¹³ PPG Paragraph: 012&013 Reference ID: 10-012-20180724

¹⁴ PPG Paragraph: 018 Reference ID: 10-017-20180724

¹⁵ PPG Paragraph: 031 Reference ID: 23b-031-20161116

¹⁶ PPG Paragraph: 002 Reference ID: 25-002-20140612

¹⁷ PPG Paragraph: 003 Reference ID: 25-003-20140612

¹⁸ PPG Paragraph: 008 Reference ID: 25-008-20140612

between the desirability of funding infrastructure from the levy and the potential viability impact¹⁹.

- 2.1.15 At examination, the charging authority should also set out any known site-specific matters for which Section 106 contributions may continue to be sought²⁰.
- 2.1.16 For the purposes of CIL, a charging authority should use an area-based approach, involving a broad test of viability across their area. This should use appropriate available evidence, recognising that the available data is unlikely to be fully comprehensive. A sample of site types should be used, with a focus on strategic sites. More fine-grained sampling may be required where differential CIL rates are set. Rates should be reasonable and include a buffer, but there is no requirement for a proposed rate to exactly mirror the evidence²¹.
- 2.1.17 Differential rates may be set in relation to geography, development type and/or scale. However undue complexity and disproportionate impact should be avoided. The charging authority should consider a zero CIL rate for locations, strategic sites and specific development types with low, very low or zero viability (subject to state aid compliance)²².

Other guidance on viability testing for development

- 2.1.18 Guidance has been published to assist practitioners in undertaking viability studies for policy making purposes – “Viability Testing Local Plans - Advice for planning practitioners”²³. The foreword to the Advice for planning practitioners includes support from DHCLG, the LGA, the HBF, PINS and POS. PINS and the POS²⁴ state that:

“The Planning Inspectorate and Planning Officers Society welcome this advice on viability testing of Local Plans. The use of this approach will help enable local authorities to meet their obligations under NPPF when their plan is examined.”

- 2.1.19 The approach to viability testing adopted for this study follows the principles set out in the Advice. The Advice re-iterates that:

“The approach to assessing plan viability should recognise that it can only provide high level assurance.”

- 2.1.20 The Advice also comments on how viability testing should deal with potential future changes in market conditions and other costs and values and, in line with PPG, states that:

“The most straightforward way to assess plan policies for the first five years is to work on the basis of current costs and values”. (page 26)

- 2.1.21 But that:

“The one exception to the use of current costs and current values should be recognition of significant national regulatory changes to be implemented.....” (page 26)

Guidance on Land Value Benchmarks

¹⁹ PPG Paragraph: 009 Reference ID: 25-009-20140612

²⁰ PPG Paragraph: 017 Reference ID: 25-017-20140612

²¹ PPG Paragraph: 019 Reference ID: 25-019-20140612

²² PPG Paragraph: 021 Reference ID: 25-021-20140612

²³ The guide was published in June 2012 and is the work of the Local Housing Delivery Group, chaired by Sir John Harman, which is a cross-industry group, supported by the Local Government Association and the Home Builders Federation.

²⁴ Acronyms for the following organisations - Department of Communities and Local Government, LGA Environment and Housing Board, Home Builders Federation, Planning Inspectorate, Planning Officers Society

2.1.22 Planning Practice Guidance sets out the principles that area wide viability studies should follow when taking land values into account:

'To define land value for any viability assessment, a benchmark land value should be established on the basis of the existing use value (EUV) of the land, plus a premium for the landowner. The premium for the landowner should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The premium should provide a reasonable incentive, in comparison with other options available, for the landowner to sell land for development while allowing a sufficient contribution to comply with policy requirements. This approach is often called 'existing use value plus' (EUV+).'²⁵

Benchmark land value should:

- *be based upon existing use value*
- *allow for a premium to landowners (including equity resulting from those building their own homes)*
- *reflect the implications of abnormal costs; site-specific infrastructure costs; and professional site fees and*
- *be informed by market evidence including current uses, costs and values wherever possible. Where recent market evidence is used to inform assessment of benchmark land value this evidence should be based on developments which are compliant with policies, including for affordable housing. Where this evidence is not available plan makers and applicants should identify and evidence any adjustments to reflect the cost of policy compliance. This is so that historic benchmark land values of non-policy compliant developments are not used to inflate values over time.'²⁶*

2.1.23 PPG goes on to define a 'premium' for a landowner as being:

'...reasonable incentive for a land owner to bring forward land for development while allowing a sufficient contribution to comply with policy requirements'²⁷

2.1.24 The benchmark land values should therefore both reflect emerging policy requirements and planning obligations, and be informed by comparable market evidence which may or may not have taken current and or emerging policy requirements into account.

2.1.25 Advice for Planning Practitioners is similar to that contained within the PPG and states:

'We recommend that the Threshold Land Value is based on a premium over current use values and credible alternative use values.....).'

2.1.26 Advice for Planning Practitioners also notes that reference to market values can still provide a useful 'sense check' on the benchmark values that are being used for testing, but it is not necessarily recommended that these are used as the basis for the input to a model. Therefore, land value benchmarks used to test plan policies can be less than the value at which land is being traded in the market. This point was highlighted in the London Mayoral CIL examiner's report (also from 2012) which, sets out important principles in the treatment of benchmark land values

²⁵ PPG Paragraph 012 Reference ID: 10-012-20180724

²⁶ PPG Paragraph 013 Reference ID: 10-013-20180724

²⁷ PPG Paragraph 015 Reference ID: 10-015-20180724

'Finally the price paid for development land may be reduced. As with profit levels there may be cries that this is unrealistic, but a reduction in development land value is an inherent part of the CIL concept. It may be argued that such a reduction may be all very well in the medium to long term but it is impossible in the short term because of the price already paid/agreed for development land. The difficulty with that argument is that if accepted the prospect of raising funds for infrastructure would be forever receding into the future. In any event in some instances it may be possible for contracts and options to be re-negotiated in the light of the changed circumstances arising from the imposition of CIL charges.'

2.1.27 Recent RICS research also highlights the drawback in using market evidence to set land value benchmarks:

'If market value is based on comparable evidence without proper adjustment to reflect policy compliant planning obligations, this introduces a circularity, which encourages developers to overpay for sites and try to recover some or all of this overpayment via reductions in planning obligations'.²⁸

2.1.28 Recent guidance in London²⁹ is also consistent with these views, stating that:

'The Mayor considers that the 'Existing Use Value plus' (EUV+) approach is usually the most appropriate approach for planning purposes. It can be used to address the need to ensure that development is sustainable in terms of the NPPF and Development Plan requirements, and in most circumstances the Mayor will expect this approach to be used.' Para 3.47

Local policy requirements

2.1.29 The NPPF is clear that viability testing should take into account the costs of any requirements likely to be applied to development. Therefore, a planning policy review has been undertaken. The East Devon District Local Plan is the main planning document for East Devon District Council. It sets out the overarching spatial strategy and development principles for the area together with more detailed policies to help determine planning applications. An analysis of the Local Plan policies is set out in Annex E which provides a summary of each policy, potential impact on viability and implications for viability testing. Policies that have been identified as having implications for viability testing include:

- **Strategy 9 - Major Development at East Devon's West End**, which refers to funding contributions sought from development to secure infrastructure. Infrastructure funding allowances included in viability testing for strategic West End sites including Cranbrook.
- **Strategy 10 - Green Infrastructure in East Devon's West End**, which refers to mitigation provision from development. Provision of open space, SAMMS and SANGS is included in the modelling.
- **Strategy 11 - Integrated Transport and Infrastructure Provision at East Devon's West End**, which refers to requirements for transport infrastructure to support development in the West End; plus low carbon heat and power supply; waste management facilities and waste water treatment; data service infrastructure provision; health and education provision. Infrastructure costs are included in testing in line with the IDP.
- **Strategy 12 - Development at Cranbrook**, which refers to gypsy and traveller provision, phased delivery of 18.4ha employment land, town centre, social/community/education,

²⁸ RICS, 2015, Financial Viability Appraisal in Planning Decisions: Theory and Practice

²⁹ GLA, 2017, Affordable Housing and Viability SPD 2017

district heating, transport and other infrastructure. The viability testing is based on the Cranbrook Plan, with infrastructure costs included.

- **Strategy 13 - Development North of Blackhorse/Redhayes and 14 - Development of an Urban Extension at Pinhoe.** These refer to neighbourhood centre, social & community facilities, low carbon heat and energy network (Blackhorse/Redhayes, contributions to education and transport infrastructure; plus employment provision. The viability testing includes West End strategic case studies with infrastructure costs from the IDP.
- **Strategy 17 - Future Development at or near Exeter International Airport,** which refers to noise mitigation requirements. Noise mitigation costs are included for Cranbrook.
- **Strategy 20 – Development at Axminster,** which refers to 8 ha employment/mixed use; 1FE primary school, North-South relief road, 15 ha employment at Millwey Rise, plus mitigation for the River Axe phosphate load. Infrastructure costs included in testing (in line with the IDP), plus mitigation costs.
- **Strategies 22-26 Development at Exmouth, Honiton, Ottery St Mary, Seaton and Sidmouth,** which variously require transport, education and open space. Allowances are included for the larger case studies in these locations.
- **Strategy 31- Future Job and Employment Land Provision,** which requires that large scale housing development should include 1 job/dwelling and 1ha employment land for every 250 homes. The strategic site case studies include allowances for employment land in gross site area.
- **Strategy 34 - District Wide Affordable Housing Provision Targets,** with 25% affordable housing in Axminster; Exmouth; Honiton; Ottery St Mary; Seaton; and major strategic 'West End' development sites. 50% affordable housing elsewhere. Mix is 70% social/affordable rented and 30% intermediate or other. Affordable housing is included in dwelling mix for case studies above 10 dwellings.
- **Strategy 35 – Exception Mixed Market and Affordable Housing at Villages, Small Towns and Outside Built-up Area Boundaries,** with 66% minimum affordable dwellings. The viability testing includes RES sites with 66% affordable housing.
- **Strategy 36 - Accessible and Adaptable Homes and Care/Extra Care Homes,** which requires that for 10 dwellings all of the affordable housing and around 20% of market units will meet part M4(2). M4(2) costs are included in testing.
- **Strategy 38 - Sustainable Design and Construction -** larger developments in the West End which will include allowances for district heat. Larger commercial developments includes BREEAM Very Good.
- **Strategy 40 - Decentralised Energy Networks,** which requires that new development of 1,000 sq m or ten plus dwellings to connect to any existing, or proposed, decentralised energy network. The viability testing of larger sites includes district heat connection costs.
- **Strategy 43 - Open Space Standards,** which set 3.0-3.5 sq m amenity, 1 sq m children/youth and 29-32 sq m other open space per person, with different requirements for size and location of development. Open space standards are included in the case studies.
- **Strategy 47 - Nature Conservation and Geology,** which requires mitigation for impacts on Exe Estuary or Pebblebed Heaths European sites if within 10 km. SAMMS allowances included in testing, along with onsite SANGS for Cranbrook.

2.1.30 In addition to the Local Plan, the Cranbrook DPD also contains requirements that have an impact on viability. These include:

- Secondary and primary schools, with special educational need provision
- Provision of community buildings
- Provision of employment land
- Open space (children's play, open space and allotments)
- Space for retail development
- Sports hub and pitches/courts
- Space for the expansion of the energy centre
- Gypsy and traveller sites
- Cemetery
- Undergrounding of power lines
- Self/custom build plots
- Transport enhancements including facilities for additional rail services as well as London Road enhancements
- Enhanced carbon standards
- Parking standards
- Electric vehicle charging
- SANGS provision
- Nationally Described Space Standards

2.2 Principles of viability testing

2.2.1 The Advice for planning practitioners summarises viability as follows:

'An individual development can be said to be viable if, after taking account of all costs, including central and local government policy and regulatory costs and the cost and availability of development finance, the scheme provides a competitive return to the developer to ensure that development takes place and generates a land value sufficient to persuade the land owner to sell the land for the development proposed. If these conditions are not met, a scheme will not be delivered.' (page 14)

2.2.2 Reflecting this definition of viability, and as specifically recommended by the Advice for planning practitioners, we have adopted a residual value approach to our analysis. Residual value is the value of the completed development (known as the Gross Development Value or GDV) less the costs of undertaking the development. The residual value is then available to pay for the land. The value of the scheme includes both the value of the market housing and affordable housing (and other non-residential values). Scheme costs include the costs of building the development, plus professional fees, scheme finance and a return to the developer. Scheme costs also include planning obligations (including affordable housing, direct s106 costs) and the greater the planning obligations, the less will be the residual value.

2.2.3 The residual value of a scheme is then compared with a benchmark land value. If the residual value is less than the benchmark value, then the scheme is less likely to be brought forward for development and is considered unviable for testing purposes. If the residual value exceeds the benchmark, then it can be considered viable in terms of policy testing.

2.2.4 The benchmark land values used in the testing are a measure of a competitive return to a landowner for the purposes of viability testing. PPG paragraph 012 – 015 sets out that

benchmark land values should be based on the current use value of a site plus an appropriate site premium in most cases. The principle of this approach is that a landowner should receive at least the value of the land in its 'pre-permission' use, which would normally be lost when bringing forward land for development. The benchmark land values used in this study are based on the principle of 'Existing Use Value Plus' which is considered further, along with other approaches to determining land value in a later chapter.

- 2.2.5 Note the approach to Local Plan level viability (or CIL) assessment does not require all sites in the plan to be viable. The Harman Report says that a site typologies approach (i.e. assessing a range of example development sites likely to come forward) to understanding plan viability is sensible, a view echoed in CIL guidance. Viability '*...is to provide high level assurance that the policies with the plan are set in a way that is compatible with the likely economic viability of development needed to deliver the plan*".
- 2.2.6 The residual land value assessments carried out in this study to model the viability of case studies have been undertaken using the Three Dragons Toolkit. The range of development scenarios in East Devon could be extensive and therefore it is not possible to model each of these. In line with national guidance set out in the PPG, typical typologies have been developed and tested using a range of value and cost assumptions, to give a broad understanding of viability across East Devon.

3 Approach to testing and case studies

3.1 Uses included in the testing

3.1.1 The uses tested are listed below and focus on developer-led forms of development rather than publicly led uses such as new infrastructure facilities or development types that are not common:

Residential

- Residential for sale

Specialist housing

- Sheltered housing
- Extra care housing
- Care homes

Non-residential

- Offices
- Industrial/warehouse
- Retail – in town and edge of town
- Leisure
- Hotel

3.2 Case study selection

3.2.1 The study uses a case study approach for the testing undertaken. The case studies selected for testing were identified in discussion with East Devon District Council. They are not intended to represent specific development proposals, but to reflect typical forms of development that are likely to come forward over the plan period. The exception is Cranbrook, where the development in the new Cranbrook Plan is specifically tested, and this is discussed separately in section 6.

3.2.2 The case studies are set out below, organised in the three broad groups of development types (residential, specialist housing and non-residential).

Residential and specialist housing case studies

3.2.3 The residential case studies are set out in table 3.1. These include a set of small sites which are below the affordable housing threshold (10 dwellings) as well as some medium and large sites. These site typologies have been developed in discussion with the East Devon District Council and the large sites were developed to be representative of the strategic sites in the Local Plan. The site typologies were also discussed in the July 2017 developer workshop, where it was suggested that a higher density town centre scheme should be included, and this

has been added. The proportions of net developable reflect policy requirements as well as typical characteristics³⁰.

- 3.2.4 The specialist housing case studies in Table 3.2 include sheltered and extra care housing³¹. The care home typology covers residential care homes or nursing homes and is where integral 24-hour personal care and/or nursing care are provided together with all meals.
- 3.2.5 At the July 2017 workshop it was suggested that age-restricted market housing/retirement villages might also be included. Retirement villages can include age-restricted market housing, sheltered/extra care and care home accommodation, as well as a range of communal facilities. Whilst we indicate what a Village might comprise of, it is difficult to develop a typical scheme and the variance could be considerable. Therefore, in terms of charging we consider that the separate uses within a Village have been tested and in terms of CIL, these would each be charged at the prevailing rate for that use e.g. retail, general housing or supported housing.
- 3.2.6 Rural exceptions sites (Local Plan Strategy 35) are not included in the viability testing as the priority for these sites is maximum delivery of affordable housing³².

Table 3.1 Residential case studies

Case study number	Description	Dwellings	Density	Net site ha	Gross site ha	Net to gross
1	Small site no AH	2	30	0.067	0.067	100%
2a	Small site no AH	8	35	0.229	0.229	100%
2b	Small site with AH	8	35	0.229	0.229	100%
3	Medium site	30	35	0.857	0.9	95%
4	Medium site	50	35	1.429	1.587	90%
5	Large site	150	35	4.286	5.357	80%
6	Large site (2 developers)	500	35	14.286	20.408	70%
7	Large site (3 developers)	900	35	25.714	46.753	55%
8	High density infill	16	80	0.20	0.25	80%

Table 3.2 Specialist Housing case studies

Case study number	Description	Dwellings	Density	Net site ha	Gross site ha	Net to gross
9	Retirement housing (Sheltered)	60	120	0.50	0.50	100%
10	Supported housing (Extracare)	50	100	0.50	0.50	100%

³⁰ This approach is different to the HELAA methodology, which is an indicative approach to approximate site capacity

³¹ As defined by the retirement housing group <https://retirementhousinggroup.com/advice-retirement-housing/>

³² The preamble for Strategy 35 makes it clear that the only justification for market housing in these rural sites is to subsidise the provision of affordable housing. Infrastructure contributions or other planning obligations are not part of Strategy 35, and therefore including CIL on these sites may require additional market housing to be deliverable.

Case study number	Description	Beds	Floorspace	Gross site ha
11	Care Home	60	3,000	0.38

3.2.7 Table 3.3 shows what case studies are tested in different value areas (value areas are discussed further in section 4).

Table 3.3 Case studies by value area

Case study	Description	Dwellings	Apply in which value area?				
			East of Exeter	Cranbrook	Exmouth, Ottery Honiton, Axminster and Seaton	Sidmouth and Budleigh Salterton	Rural
1	Small site no AH	2	-	-	Yes	Yes	Yes
2a	Small site no AH	8	-	-	Yes	Yes	Yes
2b	Small site with AH	8	-	-	Yes	Yes	Yes
3	Medium site	30	-	-	Yes	Yes	Yes
4	Medium site	50	-	-	Yes	Yes	Yes
5	Large site	150	Yes	-	Yes	Yes	Yes
6	Large site	500	Yes	-	Yes	-	-
7	Large site	900	Yes	-	-	-	-
8	High density infill	16	-	-	Yes	Yes	-
9	Sheltered housing	60	Yes			Yes	
10	Extracare housing	50	Yes			Yes	
11	Care Home	60 (rooms)	Yes				

3.2.8 The Cranbrook extension testing assumptions are detailed separately in section 6.

Non residential case studies

3.2.9 As with the residential and older person housing case studies the testing has been conducted on a hypothetical typical site basis. This is because it is impossible for this study to consider viability on a site-specific basis at this stage, given that there will be insufficient data on site-specific costs and values. Site-specific testing would also be considering detail on purely speculative/assumed scenarios, producing results that would be of little use for a study for strategic consideration.

3.2.10 Retail case studies include convenience and comparison, in and out of town centre locations. There is no primary retail centre in East Devon, with the nearest prime location being Exeter City. Our town centre comparison analysis is therefore based on the small town high streets in Honiton, Exmouth, and Sidmouth and where data is available Ottery St Mary, Budleigh Salterton, Axminster and Seaton.

3.2.11 In the past leases to the main supermarket operators have commanded a premium with investment institutions. Although there are some small regional variations on values, they are reasonably standard across the country with investors focusing primarily on the strength of the

operator covenant and security of income. As a result, it is reasonable to use a broad geographical evidence base for convenience retail.

- 3.2.12 There has been a structural change in convenience retailing in recent years with an end to the expansion of the largest format convenience retailing and more emphasis on smaller supermarket formats (as used by both discount and premium convenience operators) and greater provision of small format stores, often within the Sunday trading threshold (280 sq m display floor area), also often in existing floorspace. These changes reflect the alterations in shopping habits.
- 3.2.13 Whilst it is acknowledged that some of the larger urban extensions and Cranbrook will have 'new' local and town centres these have not been tested separately as there is little or no comparable evidence to test the potentially different economic dynamic. However, emerging information from Cranbrook in particular suggests that this type of development is generally cross subsidised by the housing and therefore it is unlikely to have sufficient value to support separate charging in any event.
- 3.2.14 There is significant employment activity and planned growth in the west of the district around the airport and the periphery of Exeter. We have therefore tested office, industrial and warehouse uses in these locations as well as more traditional centres. Whilst potentially office development could be in both in and out of centre, it is anticipated that industrial uses and warehouses will be located only in out of centre locations but will vary in size.
- 3.2.15 Nationally, there has been significant growth in the provision of budget hotels³³, with relatively few full-service hotels outside the major conurbations. The most likely new-build hotel development in East Devon is a budget hotel³⁴ and the testing has used a budget hotel development of 70 rooms over two storeys, this could be in either a coastal centre or near business activity in an out of centre location.
- 3.2.16 The following table sets out not only the case study descriptions but also the assumed net developable site area for each development type and the amount of floorspace this is likely to support on typical sites across East Devon.

Table 3.4 Non residential case studies

Ref.	Use	Description	Gross floorspace (sqm)	Gross site area (h)
NR1	Office	Prime/Exeter Fringe	2,500	0.08
NR2	Office	East Devon towns	1,000	0.07
NR3	Industrial	Out of centre	1,600	0.40
NR4	Warehouse	Prime/Exeter Fringe	5,000	1.25
NR5	Retail convenience	Small local store	300	0.05
NR6	Retail convenience	Supermarket	1,100	0.2
NR7	Retail comparison	Town centre	200	0.1
NR8	Retail comparison	Out of centre/retail warehouse/park	1,000	0.25

³³ The British Hospitality Association Trends and Developments Report 2012 indicates that budget hotels are defined as a property without an extensive food and beverage operation, with limited en-suite and in-room facilities (limited availability of such items as hair dryers, toiletries, etc.), low staffing and service levels and a price markedly below that of a full service hotel.

³⁴ <https://www.knightfrank.co.uk/blog/2018/07/12/knight-frank-launches-uk-hotel-development-opportunities-2018-report>

Ref.	Use	Description	Gross floorspace (sqm)	Gross site area (h)
NR9	Hotel	Budget/business	2,800 (70 rooms)	0.16

4 Residential and specialist housing testing assumptions

4.1 Residential - testing assumptions

Mix of dwellings

- 4.1.1 For each case study, a mix of dwellings was devised which varied with the density of the scheme. These mixes were agreed with East Devon District Council.

Table 4.1 Market dwelling mix

Type	30 dph	35 dph	40 dph	80 dph
2 bed flat		5%	5%	80%
2 bed terrace	10%	15%	15%	20%
3 bed terrace	10%	10%	20%	
4 bed terrace			20%	
3 bed semi	25%	20%	20%	
3 bed detached	20%	20%	10%	
4 bed detached	25%	20%	10%	
5 bed detached	10%	10%	0%	

Table 4.2 Affordable rented dwelling mix

Type	30 dph	35 dph	40 dph	80 dph
2 bed flat	50%	50%	50%	100%
2 bed terrace	25%	25%	25%	
3 bed terrace	25%	25%	25%	

Table 4.3 Shared ownership dwelling mix

Type	30 dph	35 dph	40 dph	80 dph
2 bed flat				100%
2 bed terrace	50%	50%	50%	
3 bed terrace	50%	50%	50%	

Size of dwellings

- 4.1.2 The size of dwelling affects both their market value (as sale values were assessed on a per sq m basis) and their development costs. For schemes of 35 and 40dph, an allowance of 10% of floor area in table 4.4 is added to the 1-2 storey flats for circulation and common areas. An allowance of 15% circulation is made for the 4-5 storey 80dph scheme. An allowance of 25% floor area is added to Sheltered housing, and 35% for ExtraCare housing to allow for circulation, common and service areas.

Table 4.4 Market and affordable dwelling sizes

Dwelling sizes	sq m net of circulation	
	Market	Affordable
1 bed flat	50	50
1 bed flat (Sheltered)	50	50
1 bed flat (Extracare)	65	65
2 bed flat	61	61
2 bed flat (Sheltered)	75	75
2 bed flat (Extracare)	80	80

Dwelling sizes	sq m net of circulation	
	Market	Affordable
2 bed terrace	70	70
3 bed terrace	93	93
4 bed terrace	115	
3 bed semi	100	
3 bed detached	105	
4 bed detached	125	
5 bed detached	160	

Values

- 4.1.3 The set of the market values in East Devon was derived from an analysis of new build Land Registry data for the period June 2014 to April 2018, indexed to May 2018 using Land Registry House Price Index (details in Appendix B). The Land Registry data was matched to Energy Performance Certificates to enable a value per sq m to be generated for the different house types. This is then grossed up by the dwelling sizes to provide an approximate dwelling value.
- 4.1.4 Analysis of the house price data shows that there are different house price value areas in East Devon. These are shown in Figure 4.1 below.

Figure 4.1 East Devon Value Areas

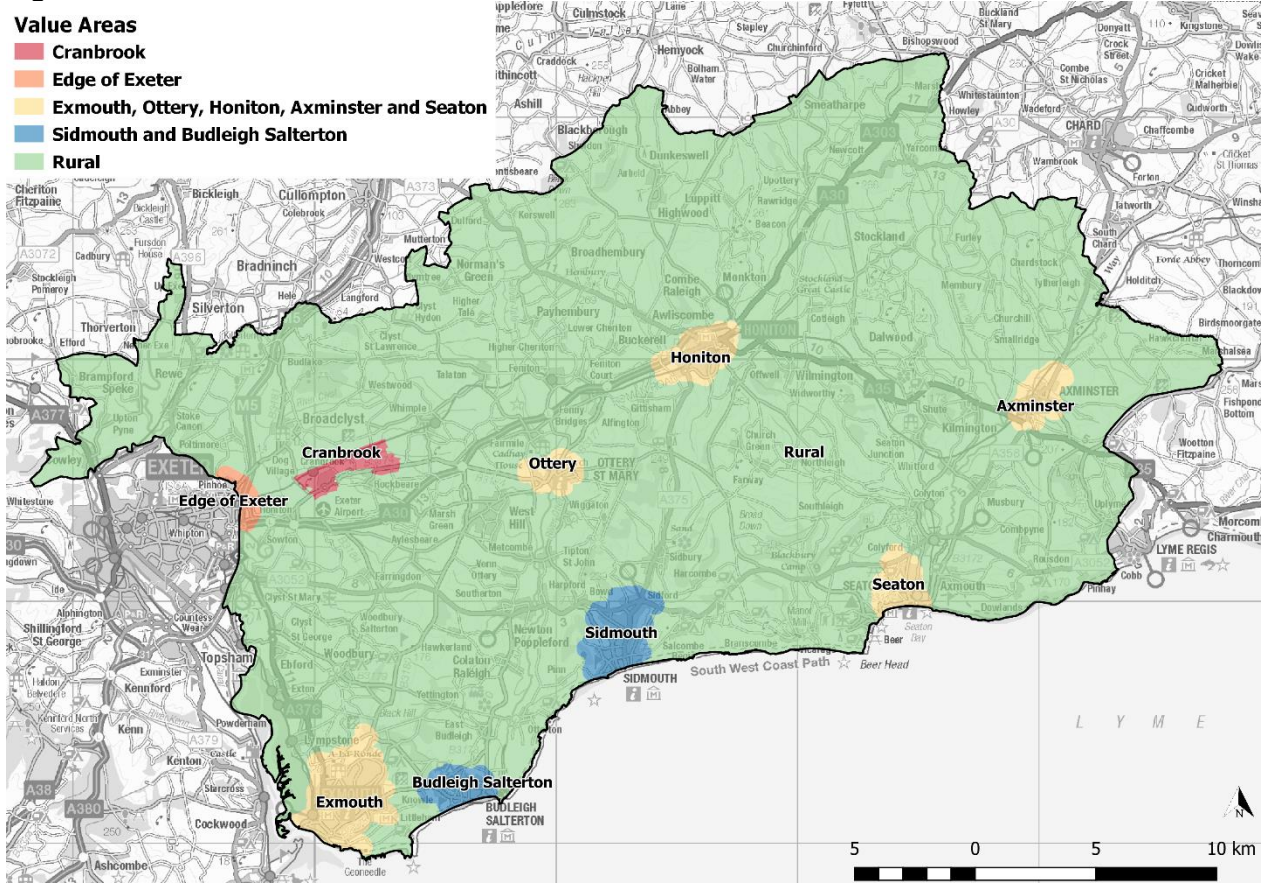


Table 4.5 Market values by dwelling types

Dwelling value estimates	1 bed flat	2 bed flat	2 bed terrace	3 bed terrace	4 bed terrace	3 bed semi	3 bed detached	4 bed detached	5 bed detached
Edge of Exeter ³⁵	£157,000	£191,000	£200,000	£266,000	£328,000	£333,000	£344,000	£409,000	£524,000
Cranbrook	£144,000	£176,000	£202,000	£268,000	£332,000	£299,000	£309,000	£368,000	£471,000
Exmouth, Ottery, Honiton, Axminster & Seaton	£175,000	£213,000	£197,000	£262,000	£324,000	£310,000	£340,000	£405,000	£518,000
Sidmouth and Budleigh Salterton	£219,000	£267,000	£279,000	£371,000	£459,000	£370,000	£451,000	£537,000	£687,000
Rural	£105,000	£128,000	£212,000	£282,000	£349,000	£314,000	£359,000	£428,000	£548,000

- 4.1.5 For small sites of three dwellings or less a 5% value premium is included for exclusivity.
- 4.1.6 Sheltered and extracare values are based on the Retirement Housing Group (RHG) guidance³⁶. Selling prices for sheltered schemes (CS9) are based on the selling price of a 3-bed semi in each market area. The selling price of a 2-bed sheltered flat is the same as the 3-bed semi, with the value of a 1 bed sheltered flat set at 75% of a 3-bed semi. For extracare schemes, selling prices are 125% of the selling prices for sheltered housing. These values were checked against the limited sales evidence available, which included two sheltered schemes in Exeter and an extracare scheme in Exmouth. This cross check suggested that extracare values in this area may be lower than the values indicated by the RHG method and so these have been adjusted accordingly. Because of the paucity of local evidence, the value areas for sheltered and extracare housing have been grouped and the values are in Table 4.6.
- 4.1.7 The viability testing for sheltered and extracare schemes includes affordable housing at policy levels and the value of the affordable housing is the same as for general housing. However, affordable housing may not be required in all cases (for example if the use class is C2 rather than C3).

³⁵ Edge of Exeter value area draws from new build on the periphery of Exeter, identified area is illustrative of broad location.

³⁶ Three Dragons for RHG, 2016, CIL and Sheltered/Extracare Developments briefing note.

Table 4.6 Sheltered and extracare values

Location	Market				Affordable Rent				Shared ownership			
	Sheltered		Extracare		Sheltered		Extracare		Sheltered		Extracare	
	1bf	2bf	1bf	2bf	1bf	2bf	1bf	2bf	1bf	2bf	1bf	2bf
Sidmouth Budleigh Salterton/ Rural	244,985	326,647	306,231	408,309	67,000	100,000	67,000	100,000	183,739	244,985	229,674	306,231
East of Exeter/ Exmouth, Ottery, Honiton, Axminster & Seaton	235,651	314,202	294,564	392,752	67,000	100,000	67,000	100,000	176,738	235,651	220,923	294,564

Care home

4.1.8 Care homes are assumed to have a capital value of £95,000 per bedroom, based on a review of data from Costar Suite. We have tested a care home of 60 beds with a floorspace of 3,000 sq m³⁷.

Affordable housing values

4.1.9 The viability testing is based upon 25% affordable housing split 70% affordable rent and 30% shared ownership³⁸. In rural areas, Budleigh Salterton and Sidmouth the proportion of affordable housing is tested at 50% in line with policy.

4.1.10 Discussion with the Council’s Housing Enabler in November 2017 and a survey of local Registered Providers in January 2018 was used to provide the transfer values for affordable housing in East Devon (i.e. an estimate of how much the RPs may pay for the affordable units).

Table 4.7 Affordable housing transfer values

	Edge of Exeter	Cranbrook	Exmouth, Ottery, Honiton, Axminster & Seaton	Sidmouth & Budleigh Salterton	Rural
Affordable rent					
1 bed flat	£90,000	£90,000	£67,000	£67,000	£67,000
2 bed flat	£121,000	£121,000	£100,000	£100,000	£100,000
2 bed terrace	£146,000	£146,000	£108,000	£108,000	£108,000
3 bed terrace	£163,000	£163,000	£136,000	£136,000	£136,000
4 bed terrace	£186,000	£186,000	£183,000	£183,000	£183,000
Shared ownership					
2 bed terrace	£168,200	£156,800	£159,400	£212,800	£175,900
3 bed terrace	£198,000	£184,600	£187,700	£250,500	£207,100

Build costs

4.1.11 Build costs can vary due to location, development type, proposed tenure type, proposed tenure mix, storey height, and building use. The Build Cost Information Service (BCIS)³⁹ is used to provide benchmarking information for build costs. A BCIS factor can also be utilised to adjust data for its location. Residential build costs are based on actual tender prices for new builds over a 15-year period and the tender price data is rebased to East Devon prices using BCIS defined adjustments, to give the build costs for small and large schemes.

4.1.12 We understand from various cost consultants that volume and regional house builders can comfortably operate within the BCIS lower quartile cost figures, especially given that they are likely to achieve significant economies of scale in the purchase of materials and the use of

³⁷ Note that the care home case study is tested using the non-residential toolkit and therefore the appraisal summary can be found in Annex F

³⁸ Note that the policy allows social or affordable rent, and intermediate or other

³⁹ Published by the Royal Institution of Chartered Surveyors (RICS)

labour. Many smaller and medium sized developers of houses are usually unable to attain the same economies, so their construction costs may be higher although this will vary between housebuilders and sites. We have worked with BCIS to identify how costs change according to the size of the development. We have used this analysis by BCIS to inform our approach to testing in East Devon. Note that the variable build costs by site size is applied to houses only, as flat build costs do not show the same pattern – instead flat build costs vary by height.

- 4.1.13 In addition to the dwelling build costs, allowances are made of 10-15% on build costs for external works⁴⁰ and contingency. For smaller schemes, the higher build costs are combined with higher allowances for external works and contingency, while for larger sites we use lower dwelling costs and external works allowances but with additional allowances for site infrastructure costs. For larger sites, specific allowances are also made for garages, with £7,500 for each detached house. Table 4.8 illustrates the BCIS rates and Table 4.9 shows how they are applied to the different case studies in the testing, along with the further allowances for site infrastructure and garages.

Table 4.8 Residential development costs

Type	Base build costs £/sq m	Site size dwellings
Estate Housing Mean +5%	£1,274	2-5
Estate Housing Mean	£1,213	6-10
Estate Housing Mean 95%	£1,152	11-50
Estate Housing Mean 92%	£1,116	51-100
Estate Housing Mean 89%	£1,080	101-200
Estate Housing Lower Quartile	£1,038	201+
Flats 1-2 storey	£1,384	All
Flats 3-5 storey	£1,392	All
Supported housing mean	£1,554	All

⁴⁰ External works include local hard and soft landscaping, footpaths and internal road, drainage and service diversions and parking

Table 4.9 Other construction costs

Case Study Details								
Case study	Description	Dwellings	BCIS rate	Prof Fees	Residual s106/dwg ⁴¹	External works+ contingency%/ site infrastructure%	Garages allowance (total)	District Heating Cost (East of Exeter only)/ dwelling
1	Small site no AH	2	Mean + 5%	8%	£0	15%/0%	£8,250	-
2a	Small site no AH	8	Mean	8%	£0	15%/0%	£33,000	-
2b	Small site with AH	8	Mean	8%	£0	15%/0%	25% AH £24,750 50% AH £15,000*	-
3	Medium site	30	95% Mean	8%	£1,500	15%/0%	25% AH £84,375 50% AH £56,250*	-
4	Medium site	50	95% Mean	8%	£1,500	15%/0%	25% AH £140,625 50% AH £93,750*	-
5	Large site	150	89% Mean	6%	£1,500	15%/10%	25% AH £421,875 50% AH £281,250*	£5,000
6	Large site (2 developers)	500	Lower quartile	6%	£1,500	15%/15%	£1,406,250	£5,000
7	Large site (3 developers)	900	Lower quartile	6%	£1,500	15%/15%	£2,531,250	£5,000
8	High density infill	16	Mean 3-5 storeys	8%	£1,500	15%/0%	-	-
9	Sheltered housing	60	Mean	6%	£1,500	15%/0%	-	-
10	Extracare housing	50	Mean	8%	£1,500	15%/0%	-	-

* There is no garages allowance for affordable housing

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⁴¹ Note that case studies 5-7 have also been tested with an allowance of £20,000 for s106 as a sensitivity test

Other residential development costs

4.1.14 There are a range of other standard costs that need to be applied when undertaking the testing, and these include:

Table 4.10 Other development costs

Type	Cost	Comment
Professional fees	Up to 50 dwellings 8% 51+ dwellings 6%	of build costs
Finance	6%	of development costs (net of inflation)
Marketing fees	3%	of GDV
Developer return	15-20%	of GDV
Contractor return	6%	of build costs
Residual s106/278	£1,500 for all case studies over 10 dwellings	Per dwelling for children's play/informal greenspace/minor local transport
Affordable Housing	25% except in Rural Areas, Budleigh Salterton and Sidmouth 50%	70% affordable rented and 30% shared ownership
Agents and legal	1.75%	
Allowance for habitats (non CIL) and accessibility	£201.61	Per dwelling allowance for Strategic Access Management and Monitoring (SAMMs) ⁴² .
Garages	£7,500	Applied for each detached house – see case study listing Assumed floor area 6m x 3m = 18sqm
DCF debit rate	6%	
DCF credit rate	0%	
Development rate per annum	Average 50 dwellings per developer/outlet per annum	First year will have reduced completions

4.1.15 Sales periods are typically longer for retirement housing than for general needs housing. In line with the RHG guidance we have assumed that 40% of units are sold at the end of the first year of sales, 30% during the second year of sales and 30% during the third year; with an 18 month build period before sales commence.

⁴² http://eastdevon.gov.uk/media/2095279/plg_eeph10kzones-1.pdf. Note that this amount is based on development falling within 10km of both the Pebblebed Heaths and Exe Estuary – development outside this area will pay less (or nothing).

Additional costs

- 4.1.16 The proposed changes to the CIL regulations published as a consultation by MHCLG in December 2018 abolish regulation 123 lists and remove s106 pooling restrictions. If these proposed changes are adopted, development may make appropriate contributions to infrastructure delivery through s106 where it meets legal tests (directly related, fair, etc.), whilst CIL can also be spent to help meet funding gaps.
- 4.1.17 We are aware that some of the strategic sites in East Devon have policy requirements with viability implications (see the review of the Local Plan policies in sections 2). These include education, community and transport requirements. Based on discussion with East Devon District Council about the gap funding for these schemes we have allowed £20,000 per dwelling against these costs for the three large case study sites (CS5, CS6 and CS7).

Policy requirements

- 4.1.18 Housing has been assumed to meet Building Regs M4(2) Category 2, for all affordable and 20% of market housing. This allowance is based on the DCLG Housing Standards Costs Impact Document published in September 2014. However, whilst an allowance has been made this is a conservative approach as it is likely that these standards are starting to filter through general build costs prepared by BCIS.

4.2 Benchmark land values

- 4.2.1 Benchmark land values have been developed in accordance with the guidance discussed in section 2.1.
- 4.2.2 The previous CIL viability study in East Devon included a set of residential land value benchmarks that varied between £300,000 per ha for strategic sites to £1,000,000 per ha for smaller residential sites in higher value areas.
- 4.2.3 Land values were discussed at the July 2017 workshop. The residential land values discussed were as follows:
- Rural, Coast and Sidmouth £900,000 - £1,000,000 per ha
 - Axminster, Honiton, Ottery, Exmouth, Seaton £500,000 - £600,000 per ha
 - Large allocated/strategic sites including Cranbrook £300,000 per ha
- 4.2.4 The workshop discussion considered these values and while there was some suggestion that they could be too low in some circumstances, no alternative figures were suggested.
- 4.2.5 A review has been undertaken of market land transactions in East Devon and the edge of Exeter, using the Costar data basis. See Annex A for details. The land sales cover a broad spread of values, with the values per ha both above and below the benchmarks discussed in the workshop. A review was also undertaken of land titles for development sites (also in Annex A), and this also provided examples of values per ha. The land titles evidence suggested that it is not uncommon for land to be worth less than the benchmarks discussed at the workshop, with

most of the values/transactions above agricultural values of £19,750/ha⁴³ but less than the benchmarks.

- 4.2.6 Industrial land in Exeter may be worth in the region of £0.8m/ha, for serviced and consented unconstrained industrial/warehouse sites that are in a typical urban, brownfield location, with nearby uses likely to include later, modern residential developments⁴⁴. It is likely that industrial land in the less well-connected or sought-after locations in East Devon will be worth significantly less. The benchmark of £1m/ha is 25% above this industrial value and it is considered that this is sufficient to incentivise a sale for alternative uses (see the discussion in section 2.1).
- 4.2.7 In the parts of East Devon where industrial land is worth less than a lower benchmark will be appropriate, and we have used the £0.6m/ha discussed at the workshop.
- 4.2.8 Site values for strategic greenfield sites will reflect the lower agricultural values as well as the reduced proportion of developable land and the policy requirements typically associated with these larger developments. The benchmark of £0.3m/ha is just over 15 times agricultural values and remains a generous benchmark in the light of some of the land titles. Where there are higher than usual costs or policy requirements for strategic sites then the benchmark may need to be lower than the £0.3m in order to meet the guidance discussed in section 2.1.
- 4.2.9 As discussed in section 6 the land budget for the expansion of Cranbrook includes land for suitable alternative natural green space (SANG) and we are aware that a range of prices are being paid for land intended to perform as SANG. We have assumed that there is a small premium above agricultural value and therefore propose for the purposes of testing to allow for £25,000 per hectare (based on examples across the South of England) for the 78 hectares that are identified as land for SANG at Cranbrook. When this is included within the standard residential benchmark land value of £300,000 per gross hectare the total gross benchmark land value for all 227.94 hectares at Cranbrook is £205,414 per gross hectare.

⁴³ MHCLG, 2018, Land Value Estimates for Policy Appraisal

⁴⁴ MHCLG, 2018, Land Value Estimates for Policy Appraisal

4.2.10 Table 4.11 details the benchmarks used for the different case studies by value area.

Table 4.11 Benchmark Land Values

Case study	Description	Dwellings	East of Exeter £/ha	Cranbrook £/ha	Exmouth, Ottery, Honiton, Axminster and Seaton £/ha	Sidmouth and Budleigh Salterton £/ha	Rural £/ha	
1	Small site no AH	2	n/a	n/a	£0.6m	£1m	£1m	
2a	Small site no AH	8	n/a	n/a	£0.6m	£1m	£1m	
2b	Small site with AH	8	n/a	n/a	£0.6m	£1m	£1m	
3	Medium site	30	n/a	n/a	£0.6m	£1m	£1m	
4	Medium site	50	n/a	n/a	£0.6m	£1m	£1m	
5	Large site	150	£0.3m	n/a	£0.3m	£0.6m	£0.6m	
6	Large site	500	£0.3m	n/a	£0.3m	n/a	n/a	
7	Large site	900	£0.3m	n/a	n/a	n/a	n/a	
8	High density infill	16	n/a	n/a	£0.6m	£1m	n/a	
9	Sheltered housing	60	£1m	n/a	£0.6m	£1m	£1m	
10	Extracare housing	50	£1m	n/a	£0.6m	£1m	£1m	
11	Care home	60 (rooms)	£0.8m					
12	Cranbrook extension	4,170	n/a	£0.2m	n/a	n/a	n/a	

5 Results of the residential and older person testing

5.1 Introduction

- 5.1.1 This chapter summarises results of the residential viability appraisals for East Devon. The generic case studies are tested in the different value areas as set out in table 3.3.
- 5.1.2 The results of the testing are presented here as the residual value less the benchmark land value. This is expressed as a net residual value per sq m and provides the theoretical 'headroom' from which a CIL charge may be drawn.
- 5.1.3 Whilst there is no method prescribed to setting the CIL rate, guidance⁴⁵ suggests that the rate should not be at the margin of viability. Therefore, the CIL rate should not generally be set the same as the total headroom available and a buffer should be incorporated. The buffers used in other CIL studies have varied, but generally fall around 30-50%. The results presented here include figures with a buffer.
- 5.1.4 Some councils (and Examiners) have come to a view that a CIL rate which costs approximately 5% of GDV is generally acceptable and unlikely to put development at risk (although this does not appear in any formal guidance). We have presented 5% of the GDV per market sq m as a possible yardstick.
- 5.1.5 Each generic case study has been subjected to a detailed appraisal, complete with cashflow analysis for the larger case studies. A range of different scenarios are then presented, including residential and older person housing. Each set of scenarios sets out the maximum headroom for development contributions through a CIL charge. The testing has been simplified from previous viability studies to help provide a clearer set of results from which to recommend a CIL charge. The residential testing results are in Annex G and the summary appraisals are in Annex H, and the maximum potential CIL is based on dividing the net residual value less the benchmark land value by the market floor area⁴⁶.

5.2 Small sites

- 5.2.1 Case studies were tested at 2 and 8 dwellings in the following value areas:
- Exmouth, Ottery, Honiton, Axminster & Seaton
 - Sidmouth & Budleigh Salterton
 - Rural
- 5.2.2 Small sites are of particular interest because in most circumstances there will be no affordable housing on small sites of 9 or less units, as the threshold for affordable housing is the same as for major development (10 or more dwellings or site area of 0.5ha or more). Schemes of 6-9 units in designated rural areas are expected to make an affordable housing contribution and in-line with government policy the Council will seek such a contribution in the form of a commuted sum payment. In East Devon most of the coastal countryside is covered by Area of Outstanding

⁴⁵ Paragraph: 019 Reference ID: 25-019-20140612

⁴⁶ Please note in the summary appraisals the 'Affordable Rent Transfer Values' are listed under the 'Equity Share' heading within the summary

Natural Beauty designation⁴⁷, and East Devon also includes the Blackdown Hills AONB⁴⁸. The eight-dwelling case study is therefore tested with and without affordable housing.

Table 5.1 Small sites results – theoretical maximum CIL

Case study	% AH	Max CIL/ sq m £s	CIL with 50% buffer /sq m £s	5% of GDV/sq m £s
Exmouth, Honiton, Axminster, Seaton & Ottery CS1 2 dwgs	0%	577	289	152
Exmouth, Honiton, Axminster, Seaton & Ottery CS2a 8 dwgs	0%	518	259	143
Exmouth, Honiton, Axminster, Seaton & Ottery CS2b 8 dwgs	25%	454	227	162
Sidmouth & Budleigh Salterton CS1 2 dwgs	0%	1,153	577	198
Sidmouth & Budleigh Salterton CS2a 8 dwgs	0%	1,065	532	188
Sidmouth & Budleigh Salterton CS2b 8 dwgs	50%	827	413	249
Rural CS1 2 dwgs	0%	580	290	159
Rural CS2a 8 dwgs	0%	495	248	148
Rural CS2b 8 dwgs	50%	252	126	209

- 5.2.3 The testing shows how the higher values in Sidmouth and Budleigh result in higher potential CIL rates, and this is also apparent to a lesser extent in Rural. The provision of affordable housing in designated rural areas reduces the potential maximum CIL rates. Generally, the potential CIL rates with a 50% buffer are above the 5% of GDV⁴⁹.
- 5.2.4 Taking into account the ‘reasonableness’ of the 5% of GDV, the testing of these small sites suggests that a CIL rate of £150/sq m may be suitable for the Exmouth, Ottery, Honiton, Axminster & Seaton value area, and the Rural value area. A rate of £200/sq m may be suitable for the Sidmouth & Budleigh value area.

5.3 Medium sites

5.3.1 Three medium case studies have been tested with sites of 16, 30 and 50 dwellings in the following value areas:

- Exmouth, Ottery, Honiton, Axminster & Seaton
- Sidmouth & Budleigh Salterton
- Rural (except the higher density 16 dwelling infill scheme)

5.3.2 This covers sites with affordable housing that are mainly likely to come forward in villages and small towns, and a higher density infill flattened scheme.

⁴⁷ <http://www.eastdevonaonb.org.uk/our-work/policy-planning>

⁴⁸ <http://eastdevon.gov.uk/planning-policy/environment-and-green-infrastructure/landscape/>

⁴⁹ Note that the 5% of GDV/sq m is higher for some of these case studies with affordable housing as although the GDV decreases, the market floor space decreases to a greater extent.

Table 5.2 Medium sites – theoretical maximum CIL

Case study	% AH	Max CIL/ sq m £s	CIL with 50% buffer /sq m £s	5% of GDV/sq m £s
Exmouth, Honiton, Axminster, Seaton & Ottery CS3 30 dwgs	25%	503	251	163
Exmouth, Honiton, Axminster, Seaton & Ottery CS4 50 dwgs	25%	563	281	163
Exmouth, Honiton, Axminster, Seaton & Ottery CS8 16 dwgs	25%	177	89	185
Sidmouth & Budleigh Salterton CS3 30 dwgs	50%	864	432	249
Sidmouth & Budleigh Salterton CS4 50 dwgs	50%	949	475	249
Sidmouth & Budleigh Salterton CS8 16 dwgs	50%	340	170	293
Rural CS3 30 dwgs	50%	291	145	209
Rural CS4 50 dwgs	50%	355	177	209

5.3.3 The higher density infill scheme is less viable than the lower density schemes although still able to support a CIL rate.

5.3.4 The testing again suggests that a rate of £150/sq m may be suitable for the Exmouth, Ottery, Honiton, Axminster & Seaton value area, and the Rural value area. While the buffer would be smaller at this CIL rate for the higher density scheme (15%), it would still be able to support £150/sq m and this rate would be 4% of GDV. A rate of £200/sq m may be suitable for the Sidmouth & Budleigh value area, although the buffer for the higher density scheme would again be smaller (41%), and this rate would be 3% of GDV.

5.4 Large sites

5.4.1 The 150 dwelling case study is tested in the following value areas:

- East of Exeter
- Exmouth, Ottery, Honiton, Axminster & Seaton
- Sidmouth & Budleigh Salterton
- Rural

5.4.2 In addition, the 500- and 900-dwelling case studies are tested in the East of Exeter value area and the 500-dwelling case study in the Exmouth, Ottery, Honiton, Axminster & Seaton value area.

Table 5.3 Large sites – theoretical maximum CIL

Case study	% AH	Max CIL/ sq m £s	CIL with 50% buffer /sq m £s	5% of GDV/sq m £s
East of Exeter CS5 150 dwgs	25%	550	275	169
East of Exeter CS6 500 dwgs	25%	505	253	169
East of Exeter CS7 900 dwgs	25%	463	232	169
Exmouth, Honiton, Axminster, Seaton & Ottery CS5 150 dwgs	25%	503	252	163

Case study	% AH	Max CIL/ sq m £s	CIL with 50% buffer /sq m £s	5% of GDV/sq m £s
Exmouth, Honiton, Axminster, Seaton & Ottery CS6 500 dwgs	25%	400	200	163
Sidmouth & Budleigh Salterton CS5 150 dwgs	50%	878	439	249
Rural CS5 150 dwgs	50%	288	144	209

5.4.3 The testing again suggests that a rate of £150/sq m may be suitable for the Exmouth, Ottery, Honiton, Axminster & Seaton value area, and the Rural value area. A rate of £200/sq m may be suitable for the Sidmouth & Budleigh value area.

Large site sensitivity testing

5.4.4 Larger sites generally have the majority of their infrastructure provision on or near to the site and wholly related to directly mitigating the impact of the development. For this reason, the development industry generally has expressed a preference for such provision to be funded through s106 where there is more control over delivery. This view was echoed through the Peace review⁵⁰ which noted a number of issues when a high CIL was applied to larger sites. A number of charging authorities have responded by zero rating this type of development.

5.4.5 Additional sensitivity testing has been undertaken for the larger sites, to take account of the possibility that the r123 lists may be abolished and larger strategic sites may have to directly provide infrastructure. The sensitivity tests deduct £20,000 per dwelling from the residual value and are applied to the case studies in the East of Exeter value area, the Exmouth, Ottery, Honiton, Axminster & Seaton value area, and the Sidmouth and Budleigh value area.

Table 5.4 Large sites – theoretical maximum CIL with additional costs

Case study	% AH	Max CIL/ sq m £s	CIL with 50% buffer /sq m £s	5% of GDV/sq m £s
East of Exeter CS5 150 dwgs	25%	316	158	169
East of Exeter CS6 500 dwgs	25%	271	136	169
East of Exeter CS7 900 dwgs	25%	229	115	169
Exmouth, Honiton, Axminster, Seaton & Ottery CS5 150 dwgs	25%	269	135	163
Exmouth, Honiton, Axminster, Seaton & Ottery CS6 500 dwgs	25%	166	83	163
Sidmouth & Budleigh Salterton CS5 150 dwgs	50%	527	264	249

5.4.6 This sensitivity testing shows that if there are additional costs of this magnitude then it would be prudent to reduce the CIL rates for strategic sites. This suggests the CIL rate for strategic sites in the East of Exeter and the Exmouth, Ottery, Honiton, Axminster & Seaton value areas should be c.£100/sq m, although this would see a reduced buffer for the 500-dwelling case study in the Exmouth, Honiton, Axminster, Seaton & Ottery value area (40%). It would also be prudent to

⁵⁰ Government commissioned review of CIL - A new approach to developer contributions: A report by the CIL review team, Chaired by Liz Peace – Para 4.1.5

reduce the rates for strategic sites in Sidmouth and Budleigh to say £175/sq m, although the figures suggest that the case study may still be able to support the general £200/sq m rate. Alternatively, if the Council is concerned about delivery on these sites it may choose to zero rate them for CIL, which would allow more for onsite infrastructure and other planning obligations.

- 5.4.7 However, these reduced rates would only apply if the government makes the proposed changes to the regulations and East Devon District Council chose to amend the s106/278 requirements for strategic sites.

5.5 Older Persons Housing

- 5.5.1 Three older person housing case studies were tested - sheltered, extracare and care homes. The sheltered and extracare housing case studies were tested in amalgamated value areas and the care home in a composite East Devon value area as the evidence of values does not enable any further disaggregation. The testing for sheltered and extracare assumes a C3 use class and includes affordable housing. However, sometimes extracare is considered C2⁵¹ and if so, viability would be improved. Care homes do not include affordable housing.

Table 5.5 Older persons housing – theoretical maximum CIL

Case study	% AH	Max CIL/ sq m £s	CIL with 50% buffer /sq m £s	5% of GDV/sq m £s
Sidmouth & Budleigh Salterton older persons & Rural older persons CS9 60 dwgs sheltered	50%	0	0	262
East of Exeter, Exmouth, Honiton, Axminster, Seaton, Ottery & Feniton older persons CS9 60 dwgs sheltered	25%	117	58	202
Sidmouth & Budleigh Salterton older persons & Rural older persons CS10 50 dwgs extracare	50%	0	0	253
East of Exeter, Exmouth, Honiton, Axminster, Seaton, Ottery & Feniton older persons CS10 50 dwgs extracare	25%	75	37	199
East Devon CS11 60 rooms care home	0%	0	0	209

- 5.5.2 The sheltered and extracare housing case studies are able to support a relatively small CIL in the combined East of Exeter, Exmouth, Honiton, Axminster, Seaton and Ottery value area. However, in Sidmouth & Budleigh Salterton and in the Rural value area (where 50% affordable housing is required), older persons' housing is not able to support a CIL.
- 5.5.3 Care homes are not viable and are not able to support a CIL.

5.6 Summary

- 5.6.1 For most residential development in East Devon a CIL rate of £150/sq m can be supported. In Sidmouth and Budleigh Salterton viability is stronger and a higher rate of £200/sq m can be supported. There is no clear case for varying the rates between smaller developments without affordable housing, or larger developments with affordable housing. The viability is affected by the proportion of affordable housing required as well as the difference in market values.

⁵¹ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3177340>

- 5.6.2 The exceptions to these general rates are older persons housing, where a CIL of £0/ sq m may be appropriate for sheltered and extracare housing in East Devon.
- 5.6.3 If East Devon District Council plans to amend the r123 list to require additional infrastructure for strategic sites or the Government abolishes r123 (as proposed in the consultation), then it will be appropriate to reduce the CIL rates for the strategic sites that may be affected. A reduced CIL rate for strategic sites with additional s106 costs in the East of Exeter and the Exmouth, Ottery, Honiton, Axminster & Seaton value areas should be c.£100/sq m, and the CIL rate for strategic sites with additional s106 costs in Sidmouth and Budleigh should be £150-£175/sq m.

6 Cranbrook Testing

6.1 Introduction

- 6.1.1 Cranbrook is a new community in East Devon close to the City of Exeter. The first 3,500 dwellings already have outline consent and approximately 1,800 of these have been completed at the time of writing. In order to guide the next stage of development East Devon District Council has developed a masterplan and a draft DPD for 4,170 dwellings and supporting facilities.
- 6.1.2 Within the viability study the testing for Cranbrook is undertaken in more detail because part of the purpose of the study is to test the viability of the new Cranbrook Plan DPD and masterplan.
- 6.1.3 There are four areas identified for the expansion of Cranbrook (Bluehayes, Treasbeare, Cobdens and Grange). The masterplan and draft DPD have different requirements for the various areas in terms of development characteristics and infrastructure. For the purposes of testing the viability of the plan and any CIL implications all of these four areas have been tested jointly. The draft DPD key requirements are set out in Table 6.1.

Table 6.1 Key Cranbrook DPD Requirements

	Bluehayes	Treasbeare	Cobdens	Grange
Dwellings	977	914	1,491	788
Nationally described space standards	New dwellings required to achieve nationally described space standards			
Education	Secondary school contributions	Primary school and early years; secondary school contributions	Primary school and early years, SEN; secondary school contributions	Secondary school contributions
Community				Community building
Open space	Formal open space and play; allotments	Formal open space and amenity, play, allotments	Formal open space and amenity, play, allotments	Formal open space and amenity, play, allotments
Sports		Sports hub with facilities and pitches	Extension of existing sports hub	
Mixed use	Business spaces	Business spaces, shops	Business spaces, shops	Business spaces, shops
Other		Land for energy centre, Gypsy and traveller pitches, noise mitigation	Gypsy and traveller pitches, site for worship, underground power lines, cemetery	Underground power lines
Self-build	4% of all dwellings will be custom/self-build			
Transport	Space for rail improvements and contributions for sustainable transport, enhancement of London Road, footbridge			
Carbon/energy	Higher carbon standards District heat			

	Bluehayes	Treasbeare	Cobdens	Grange
Suitable Alternative Natural Green Space (SANGS) and management	8ha per 1000 population generated by residential development schemes			
Town centre/other	Health & well-being hub, extracare, emergency services			

6.2 Cranbrook Testing Assumptions

6.2.1 Table 6.2 provides the land budget developed by East Devon District Council as part of the masterplanning. The residential areas make up 66% of the development area (43% of the total area including SANGS).

Table 6.2 Cranbrook Land Budget

Description	Total (Ha/dwgs)
Total Houses	4,170
Land Areas (ha)	
Residential (excluding Mixed use areas)	99.11
Mixed Use land (incl land for housing)	4.57
Gypsy and Traveller Site	3.56
B Class employment	4.93
Education	6.25
Sports Hub	11.40
Allotments	2.45
Amenity Open Space	3.43
Formal Recreation	9.80
Play Space (children)	0.49
Play Space (Youth)	0.49
Cemetery Land	1.00
SANGS	78.40
Energy Centre expansion	2.06
Total area (ha)	227.94

6.2.2 Ward Williams Associates has developed a cost plan for the Cranbrook masterplan. Following the completion of this work there have been some revisions to the estimated costs of some of the s106 items. Annex I contains the cost plan and the notes in table 6.3 and table 6.4 explain where revisions have taken place since the cost plan was produced.

Table 6.3 Cranbrook Development Costs (WWA cost plan with s106 revisions)

Item	Cost £'s	Notes
A Surveys	1,660,000	Topo, Getotech, Nuisance, Archaeological, Ecological
B Enabling Works	1,480,000	Site Clearance & Tree Protection Works

Item		Cost £'s	Notes
C	Housing	463,672,500	4,000nr Dwellings, 170nr Self-Build Plots & 15nr Traveller's Pitches ⁵² . Dwelling costs based on BCIS lower quartile. Costs are lower than WWA report as G&T pitches reduced.
D	Infrastructure	70,630,000	Primary, secondary and tertiary roads, lighting, foul and surface drainage, adoption/maintenance
E	Section 278 Works	10,540,000	Footbridge, Roundabout to Existing B3174 London Road (West), Roundabout to Existing B3174 London Road (West), Unsignalised Junction on London Road (west), Upgrading of Existing London Road, Roundabout to London Road (Adjacent Health Hub), Unsignalised Junction on London Road (east), Upgrading of 'T' Junctions on London Road, Crossing Junctions on London, Toucan crossings, Service diversions, adoption/maintenance.
F	Landscaping	31,300,000	Formal and informal greenspace, public realm, SANGS, mixed-use/employment, cemetery, energy centre land
G	Section 106	70,173,400	See separate list. Reduced from WWA report as various requirements changed by EDDC.
H	Utilities	37,820,000	District heat, electricity, water, telecoms
I	Site Wide Abnormals	22,200,000	Allowances for earthworks and strategic retaining, attenuation, undergrounding power lines, pumping stations. Power line cost is net of estimated rebate allowance and so total is less than WWA report.
J	Abnormal Plot Costs	16,990,000	Allowance for additional foundations, garages, carbon reduction over building regulations.
K	Sewage Treatment Plant and Outfall Provision Therefrom	n/a	
L	Professional Fees	43,072,196	Fees at 6%, to cover A-J above but note that in some cases the fees are only applied to selective items and not where 3 rd party allowances are provided – e.g. where there are s106 <i>contributions</i> then this does not include an additional allowance for fees. Within the overall 6%, rates of fees will vary depending on the cost item. This total is less than the WWA report as the cost of some of the s106 items has reduced with commensurate reductions in fees, and some s106 items have been changed from project costs to contributions to other projects. Note that this estimated fee total is for 25% affordable housing and where other proportions are tested the fees associated with the housing will vary slightly with costs but are maintained as the same percentage rate.
Total Estimated Development Cost		769,538,096	As at 3rd quarter 2018

⁵² Note that the cost plan and land budget allow for up to 20 pitches

6.2.3 The draft DPD and the East Devon Infrastructure Delivery Plan⁵³ have been used as the basis for the s106 items to be included in the viability testing. Where items are already part-funded, the remaining funding gap is used. Note that there are minor amendments included here that postdate the publication of the cost plan by WWA.

Table 6.4 Cranbrook s106

S106 item		Cost £'s	Notes
1	West End Cycle Routes Connecting to Cranbrook Development	2,990,000	
2	Sustainable Transport Provision	8,970,000	Reduced requirement for EV charging
3	Provision of Community Centre (Shell & Core Only) - Bluehayes	0	No longer required (differs from WWA report)
4	Provision of Community Centre (Shell & Core Only) - Treasbere	0	No longer required (differs from WWA report)
5	Provision of Neighbourhood Centres (Shell & Core Only) - at Cobdens & Grange at 1,250m ² and 1,600m ² respectively	Omitted	Allowances in landscaping and utilities
6	Provision of Community Centre (Shell & Core Only) - Grange	1,100,000	
7	Retail Asset Endowment for the Town Council	2,000,000	
8	Fitting Out Only of Childrens' Centre (Contribution Only)	30,000	
9	Provision of Primary School (420 Places)	7,200,000	
10	Provision of Primary School (630 Places)	10,770,000	
11	Enhanced Secondary Education Provision	2,740,000	
12	Special Educational Needs (SEN) Provision	1,000,000	
13	Country Park Resource Centre	-	Funded separately
14	Health and Well-being Hub building	8,769,400	Revised cost - reduced from total in WWA report
15	Extra Care Housing x 55 flats	3,500,000	Reduced contribution to DCC scheme - reduced from total in WWA report
16	"Blue Light" Emergency Services Facility	1,900,000	
17	Youth Services Facility (Build)	-	Funded separately

⁵³Including updated items for Cranbrook provided by EDDC October 2018

S106 item		Cost £'s	Notes
18	Youth Services Facility (Fit-Out)	30,000	
19	Town Council Office	-	Included within item 7
20	Library Facility (Build)	-	Funded separately
21	Library Facility (Fit-Out)	480,000	
22	Public Convenience Buildings	-	Funded separately
23	Place of Worship	-	Land only
24	Cemetery	-	Land only
25	Sports Centre & Swimming Pool	3,930,000	
26	Allotments	740,000	
27	Play Areas (Children & Youth - 0.98Ha Included in Land Budget)	1,560,000	
28	Natural Grass Sports Pitches	1,370,000	
29	Artificial Grass Sports Pitches (Off Site Contribution)	280,000	
30	Changing/Clubhouse Facilities and Parking for Sports Pitches	670,000	
31	Cricket Pitch(es) Provision	310,000	
32	Tennis Courts Provision	370,000	
33	Bowling Green(s) Provision	50,000	
34	Amenity Open Space	510,000	
35	Parks & Recreation Grounds	1,764,000	Revised cost - reduced from total in WWA report
36	Natural & Semi-Natural Green Space	1,390,000	
37	Level Crossing Highway Reprofiting	-	Funded separately
38	Second Train Station; OR Improvements to Existing Station	-	Included in item 2 above
39	Car, Cycle and Coach Parking in the Town Centre	-	Funded separately
40	Multi-Functional Cultural Space	-	
41	Plug-in and Ultra Low Emission Vehicle Charging	-	Included in item 2 above
42	Carbon Reduction Over Building Regulations	-	In plot abnormalities
43	Engine Testing Bay Noise Mitigation	1,200,000	
44	Non Infrastructure & Infrastructure Habitat Mitigation	2,050,000	
44a	SANGS maintenance	2,500,000	Not included in WWA report
Total		70,173,400	

6.2.4 In addition, the DPD includes a policy that requires dwellings to meet the nationally described space standards (NDSS). The dwelling sizes that have been applied for the viability testing (in

table 4.4) are consistent with the NDSS, ensuring that the viability impact of adopting the space standard has been considered, in accordance with Planning Practice Guidance 56-020-20150327.

6.2.5 East Devon District Council has provided a housing delivery trajectory for Cranbrook. Housing delivery under the existing outline consent is anticipated to continue to 2022/23. The additional development at Cranbrook is anticipated to have the first completions in 2020/21 and continue to 2030/31 (the end of the Local Plan period). Table 6.5 details this delivery.

Table 6.5 Cranbrook housing trajectory

Area	Year													Totals
	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9	Yr 10	Yr 11	Yr 12	Yr 13	
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	
03/P1900	150	300	400	400	400	94								1744
Bluehayes						50	150	150	150	150	150	150	27	977
Treasbeare				12	100	150	150	150	150	150	48	4		914
Cobdens			20	80	125	175	175	175	175	175	130	130	131	1491
Grange				12	55	110	110	110	110	110	110	53	8	788
<i>Extension areas</i>	<i>0</i>	<i>0</i>	<i>20</i>	<i>104</i>	<i>280</i>	<i>485</i>	<i>585</i>	<i>585</i>	<i>585</i>	<i>585</i>	<i>438</i>	<i>337</i>	<i>166</i>	4170
Total	150	300	420	504	680	579	585	585	585	585	438	337	166	5914

6.2.6 The housing delivery trajectory is used to inform the programme of costs over the development. Housing delivery is programmed to start in year 3 (2020/21).

Table 6.6 Cranbrook cost programme

Item	Programme
A	Surveys
	Year 1
B	Enabling Works
	Apportioned by units and incurred year before delivery – 36% year 2, 41% year 3 and 23% year 5
C	Housing
	Starting year before delivery, then as per housing trajectory, except traveller sites in year 5 and year 12
D	Infrastructure
	Starting year before delivery, then as per housing trajectory
E	Section 278 Works
	Apportioned by units and incurred year before delivery – footbridge cost in year 6 and remainder split 36% year 2, 41% year 3 and 23% year 5
F	Landscaping
	As per housing trajectory
G	Section 106
	As required by EDDC infrastructure planning. 39% of the s106 spend is in years 1-5 and 47% in years 6-10, and the balance in years 11 onwards.
H	Utilities
	Starting year before delivery, then as per housing trajectory
I	Site Wide Abnormals
	Starting year before delivery, then as per housing trajectory
J	Abnormal Plot Costs
	Starting year before delivery, then as per housing trajectory
K	Sewage Treatment Plant etc.
	n/a

Item		Programme
L	Professional Fees	In line with housing and other cost items above

6.3 Other Development Costs and Value Testing Assumptions

6.3.1 In addition to the Cranbrook-specific costs noted above, many of the testing assumptions for the generic typologies are the same as the testing assumptions noted in section 4.

Table 6.7 Other development costs

Type	Cost	Comment
Finance	6%	of development costs overall although varied between different cost elements
Marketing fees	3%	of GDV
Developer return	15-20%	of GDV
Contractor return	6%	of build costs
Affordable Housing	25%	70% affordable rented and 30% shared ownership
Agents and legal	1.75%	
DCF debit rate	6%	
DCF credit rate	0%	
Annual Discount Rate	0%	

6.3.2 The market and affordable values for Cranbrook are in Table 4.5 and 4.7. In addition to the values from the general market and affordable housing there are also values associated with the gypsy and traveller pitches, the self-build plots and the commercial land to be provided:

- Self-build plot values at £72,000/plot = £12.24m, split evenly between years 3 and year 7 inclusive. Self-build plot values are estimated as the residual value for custom build three/four bed houses⁵⁴.
- Employment land at £0.8m/ha (as per Exeter area employment land benchmark) for 9.5ha employment and mixed use totalling £7.6m split 50:50 in years 5 and 7.
- Gypsy and traveller plot values £825,000 split 50:50 years 6 and 13⁵⁵.

6.4 Cranbrook Testing Results

6.4.1 The extension to Cranbrook is tested at different proportions of affordable housing and at different amounts of developer return for market housing:

- 25% affordable housing with 20% developer return
- 20% affordable housing with 20% developer return
- 20% affordable housing with 17.5% developer return
- 15% affordable housing with 20% developer return
- 15% affordable housing with 17.5% developer return

⁵⁴ Sales values at 5% over general estate housing, build costs at 5% over median, 10% professional fees, 3% marketing and 15% developer return.

⁵⁵ See Annex C

Table 6.8 Cranbrook expansion – theoretical maximum CIL

Case study	% AH	Max CIL/ sq m £s	CIL with 50% buffer /sq m £s	5% of GDV/sq m £s
CS12 Cranbrook - 17.5% return 15% AH	15%	25	13	157
CS12 Cranbrook - 20% return 15% AH	15%	-56	-	157
CS12 Cranbrook - 17.5% return 20% AH	20%	-11	-	162
CS12 Cranbrook - 20% return 20% AH	20%	-94	-	162
CS12 Cranbrook - 20% return 25% AH	25%	-139	-	168

- 6.4.2 The testing shows that the proposed expansion of Cranbrook is not viable as tested with 25% affordable housing. However, the viability is improved by reducing the proportion of affordable housing.
- 6.4.3 As noted in section 2, PPG suggests a range of 15%-20% developer return. Given that the initial development at Cranbrook is now well under way it is justifiable to assume that the overall level of risk is reduced and therefore the developer return need not be at the top of the range suggested by PPG:
- With a 17.5% developer return for market housing and 15% affordable housing, the proposed expansion of Cranbrook is viable.
 - With a 17.5% developer return for market housing and 20% affordable housing, the proposed expansion of Cranbrook is marginally unviable.
- 6.4.4 While there is some viability headroom at 15% affordable housing and 17.5% developer return, it does not seem appropriate to suggest a CIL as any additional value may be best used to bring up the proportion of affordable housing to the overall district target. Even without CIL, development at Cranbrook is providing significant infrastructure contributions directly.
- 6.4.5 The current development at Cranbrook has benefited from significant public sector investment, some of it repayable. Should the expansion of Cranbrook also receive public support this may be used to increase the proportion of affordable housing or bring forward the delivery of the infrastructure required.

7 Setting a residential CIL charge

- 7.1.1 In coming to a view over an appropriate CIL charge the council will need to consider as to what an examiner will be considering when reviewing the proposed charges and supporting evidence. The Examiner will consider whether the schedule is compliant in legal terms with the 2008 Act and 2010 Regulations (as amended) and whether it is reasonable, viable and consistent with national guidance in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). To fulfil relevant legislative requirements the charging schedule should set an appropriate balance between helping to fund necessary new infrastructure and the potential effects on the economic viability of development across the district.
- 7.1.2 There is no prescribed approach to setting a CIL rate and the preferred method varies across councils that have implemented CIL. As per best practice the council will need to be informed by the evidence on CIL headroom but does not have to follow prescriptively the results of the testing. A judgement needs to be made based on a range of factors that are bespoke to east Devon and ultimately the balance between funding infrastructure and delivering the plan. Therefore, there are a number of considerations for the council:
- The data on house prices shows that the Sidmouth and Budleigh Salterton value area clearly achieves higher values than other locations on average.
 - Simplicity of charging zones – the guidance suggests that CIL should be easily understandable and minimise the need for multiple charging zones and development types. In terms of value area alone and largely as a result of achievable values, the CIL headroom results show a clear distinction, with the Sidmouth and Budleigh Salterton value area consistently with improved viability compared to other locations in East Devon. However, there is less distinction between sites of 1-9 dwellings and those of 10 plus (except for the strategic sites with additional costs).
 - Market shock. A large step change in CIL could potentially have an effect on future delivery.
 - Strategic sites – Evidence from the Peace review⁵⁶ suggests infrastructure provision for strategic sites may be best dealt with through s106, and the proposed changes to CIL regulations suggest r123 list may be abolished. The majority of impacts are localised, and delivery of mitigation is more assured through s106 mechanisms where funding is ringfenced. The testing with allowances for additional costs suggests that the CIL rate should be lower if the Council is minded to seek more infrastructure directly from strategic site development. Alternatively, a zero or very low CIL rate could be sought by the Council if they consider that higher CIL rates may risk delivery of the plan.
 - Rural exception schemes generally rely on cross subsidy, using the sale of a small number of market dwellings to enable the development to go ahead – a CIL rate on the market elements would simply require more market housing for the cross subsidising.
 - Buffer – whilst there is no method prescribed to setting the CIL rate, guidance does suggest that the rate should not be at the margin of viability. In other words, the CIL rate should not generally be set the same as the total headroom available – a buffer should generally be

⁵⁶ Government commissioned review of CIL - A new approach to developer contributions: A report by the CIL review team, Chaired by Liz Peace – Para 4.1.5

incorporated. The buffers used in other CIL studies have varied, but generally fall around 30-50%.

- Reasonableness – some councils (and Examiners) have come to a view that a CIL rate which costs no more than 5% of GDV is generally acceptable and unlikely to put development at risk.
- Discussions with the Council's development manager and the retained site-specific viability consultant have identified a number of recent schemes where both CIL liable and non-CIL liable schemes have provided less than policy compliant affordable housing for viability reasons. The reasons varied significantly between sites and included the need to provide mixed use and on-site education, listed building costs and flood mitigation, lower than expected local values, and higher existing use values in combination with lower development values. Whilst this review did not identify any systematic factors that needed to be taken into account within this study, it did indicate that some caution should be exercised in setting new rates.

General residential CIL rate setting

7.1.3 For these reasons it is recommended that the Council limit residential CIL charging zones to four main zones:

- Cranbrook, including expansion area
- Sidmouth and Budleigh Salterton
- Strategic Sites
- Elsewhere in East Devon

7.1.4 The discussion within section 6 clearly indicates that the expansion of the new settlement at Cranbrook is not able to support a CIL. Should the development at Cranbrook become more viable (such as through receipt of grant) then this viability could be used to support more affordable housing and/or bring forward the early provision of infrastructure. Therefore, the recommended CIL rate for the extension of Cranbrook is £0/sq m, and this should apply to all development in order to enable the affordable housing provision. Although the current development at Cranbrook is subject to CIL, most was consented before the schedule was adopted and therefore has not paid CIL. Therefore, it is recommended that the £0 rate for Cranbrook should cover the whole of the town and that infrastructure is funded through s106 as appropriate for any new consents within the existing or expansions areas.

7.1.5 For most residential development in East Devon a CIL rate of £150/sq m can be supported. In Sidmouth and Budleigh Salterton viability is stronger and a higher rate of £200/sq m can be supported. There is no clear case for varying the rates between smaller developments without affordable housing, or larger developments with affordable housing.

Strategic sites residential rates

7.1.6 If the national proposals to abolish r123 lists are put into place and the Council requires additional infrastructure for strategic development, then it will be appropriate to reduce the CIL rates for the sites that may be affected. A reduced CIL rate for strategic sites with additional s106 costs in the East of Exeter and the Exmouth, Ottery, Honiton, Axminster & Seaton value areas should be c.£100/sq m, and the CIL rate for strategic sites with additional s106 costs in Sidmouth and Budleigh should be £175/sq m.

7.1.7 Alternatively, if the Council is concerned about delivery on these strategic sites it may choose to zero rate them for CIL, which would allow more for onsite infrastructure and other planning obligations.

Rural exception schemes

7.1.8 Rural exception schemes are an important policy aspiration but require careful management to minimise the inclusion of market housing. The inclusion of CIL could lead to a greater number of market units being required to facilitate development. As the purpose of the policy is to maximise affordable housing it is considered that the council should set a zero CIL rate for this specific use or clearly define that Rural Exception Sites, regardless of tenure are affordable housing schemes for the purpose of CIL. There are examples of this elsewhere which have been successfully introduced following public examination, including Cornwall CIL⁵⁷.

Older person housing rate setting

7.1.9 For older persons housing the viability is less strong and overall a CIL of £0/ sq m is appropriate. This includes sheltered, extracare and care homes.

7.2 Potential residential CIL rates

7.2.1 The table below summarises the potential CIL rates in comparison with the current indexed rates. This includes the potential rates for strategic sites with additional s106 costs, although these rates are subject to national proposals for changes to r123 lists.

7.2.2 The recommended rate of £0/sq m for Cranbrook is clearly less than the current £78.83/sq m and reflects the Council’s intentions to fund the infrastructure required through s106 rather than through CIL. It also reflects the relative lack of known public sector funding compared to the existing Cranbrook consent currently being built out.

7.2.3 The recommended general residential rates are an increase of £50-£60/sq m over the current rates. However, these proposed rates are well within the theoretical maximums and will reflect the change in values since the last report was published in at the beginning of 2013.

7.2.4 The reduced rates for sheltered and extracare older persons housing result from these being separately tested, whereas they were not specifically identified as a separate use in the 2013 report. Care homes would be charged £0/sq m under the current rates and so there is no change for this use.

7.2.5 The separate potential rates for strategic sites with additional s106 costs are still above the rates that would be charged under the current schedule. However, these are well within the viability ‘headroom’ for these case studies even with the additional costs included.

7.2.6 The new rates take into account 5% of GDV ‘reasonableness’ benchmark.

Table 7.1 Current and potential residential CIL rates

Type and location of development	Current indexed CIL rate £/sq m	Proposed new CIL rate £/sq m
All development in Cranbrook	£80.09	£0

⁵⁷ Cornwall Council CIL Charging Schedule July 2018: 3.2 Definitions and Application of CIL, page 6 (<https://www.cornwall.gov.uk/media/33845920/community-infrastructure-levy-charging-schedule-final.pdf>)

Type and location of development	Current indexed CIL rate £/sq m	Proposed new CIL rate £/sq m
General residential development in Sidmouth and Budleigh Salterton	£147.23	£200
General residential development elsewhere in East Devon	£94.23	£150
Sheltered, extracare housing and care homes	£0-£147.23	£0
Rural Exception Schemes in East Devon (Local Plan Policy 35)	£147.23	£0
Strategic sites with additional s106 costs in Sidmouth and Budleigh Salterton	£147.23	£175
Strategic sites with additional s106 costs elsewhere in East Devon (except Cranbrook)	£94.23	£100

8 Non residential assumptions and results

8.1.1 None of the Local Plan policies considered are seen to significantly burden the viability for delivering non-residential uses in the Plan period. Therefore, this section sets out the assumptions used for the non-residential viability testing work to scope solely the potential for collecting CIL.

8.2 Establishing Gross Development Value (GDV)

8.2.1 In establishing the GDV for non-residential uses, this report has also considered historical comparable evidence to inform new values on a local and for some uses, national, level.

8.2.2 The following table illustrates the values established for a variety of non-residential uses, expressed in sq m of net rentable floorspace and yield. The table is based on our knowledge of the market and analysis of comparable transaction data provided by Costar Suite⁵⁸ and relevant market reports. The Costar data covers both new and existing stock, however, in order to consider the values that are most likely to be associated with new development generally, only the 4 & 5-star properties have been included, where there is sufficient transactional data. The rents and yields are capitalised within the toolkit to provide GDV for all the development types. The rents and yields used are as follows:

Table 8.1 Non residential rents and yields

Ref	Use	Rent (£ per sqm)	Yield (%)
NR1	Office (prime/Exeter Fringe)	£210	5.75
NR2	Office (town centre)	£92	7.52
NR3/4	Industrial/warehouse	£52 - £86	7.3 – 5.15
NR5	Retail convenience (local)	£206	6.75
NR6	Retail convenience (supermarket)	£210	5.5
NR7	Retail comparison (town centre)	£176	6.8
NR8	Retail comparison (out of centre)	£159	5.5
NR9	Hotel (budget)	£96,000 per room	N/A

⁵⁸ CoStar is a provider of information, analytics and marketing services to commercial estate agents, including information about space available for lease, comparable sales information, tenant information, information about properties for sale, and industry news

8.3 Costs

8.3.1 **Build cost** inputs have been established from the RICS Build Cost Information Service (BCIS) at values set at the time of this study (current build cost values) and rebased (by BCIS) to East Devon prices. The build costs adopted are based on the BCIS median values shown in the following table.

Table 8.2 Build costs

Ref	Use	£ per sqm
NR1	Office (out of centre)	£1,856
NR2	Office (town centre)	£1,889
NR3/4	Industrial/warehouse	£813-£873
NR5	Retail convenience (local)	£1,401
NR6	Retail convenience (supermarket)	£1,554
NR7	Retail comparison (town centre)	£1,061
NR8	Retail comparison (out of centre)	£848
NR9	Hotel (budget)	£1,288

8.3.2 Other costs – there are a range of other costs that are included within the assessment, these are as follows:

Table 8.3 Other costs

Cost type	Assumption	Notes
Professional fees and contingency	8% of build costs	incorporates all professional fees associated with the build, including fees for designs, planning, surveying, project managing and contingency
Sales and letting	3% of GDV	Includes any agent and legal costs and inclusive of arrangement fees
Developer return	20% of GDV	General standard in strategic assessments
Interest rates (debit and credit)	6%	General standard in strategic assessments
Acquisition fees	2% land cost	General standard in strategic assessments
Environmental standards	£25 per sqm	Applies to development 1,000 sqm plus
Stamp Duty Land Tax	As per HMRC rates	n/a
Void/rent free	Allowance for voids/rent free periods has been made for each case study.	n/a

8.4 Non residential benchmark land values

8.4.1 After systematically removing the various costs and variables detailed above from the GDV of a scheme, the result is the residual land value. This is measured against a benchmark/threshold value which reflects a value range that a landowner would reasonably be expected to sell/release their land for development.

- 8.4.2 Establishing the existing use value (EUV) of land and in setting a benchmark/threshold at which a landowner is prepared to sell to enable a consideration of viability can be a complex process. There are a wide range of site specific variables which affect land sales (e.g. position of the landowner – are they requiring a quick sale or is it a long term land investment). However, for a strategic study, where the land values on future individual sites are unknown, a pragmatic approach is required.
- 8.4.3 From discussions in previous studies, including discussions with agents it confirmed that land values vary according to both location and use. Our starting point for non-residential benchmark land values is to draw from the work undertaken to inform the residential values. In particular we refer to para 4.2.6 which sets out a figure of £800,000 per gross hectare for industrial land around Exeter. We have therefore used this for employment and hotel uses in the Exeter fringe and prime areas with a reduction to £600,000 per gross hectare in less desirable locations around the main East Devon towns. For retail development there is a greater premium, for example a town site will be greater as it will already have a comparatively high existing use value and if the potential use is retail then it will also have a higher uplift value as the landowner's expectation of a return will be higher.

8.5 Non residential results

- 8.5.1 The tables below summarise the results from the detailed assessments for each non residential development type. The assessments can be found in Annex F. The summary tables provide the following information:
- Net value per square metre.
 - Net costs per square metre - including an allowance for land cost and s106 to deal with site specific issues (e.g. On-site highways, travel plan etc. to make development acceptable).
 - Residual value per sq m (i.e. Value less costs).
 - The land value benchmark for that use - presented £s per sq m of development to take into account differences in site coverage and the number of storeys for the notional developments.
 - The viability headroom and maximum potential for CIL.
- 8.5.2 It is important to note that the analysis considers development that might be built for subsequent sale or rent to a commercial tenant. However, there will also be development that is undertaken for specific commercial operators, either as owners or pre-lets. In these circumstances the economics of the development relate to the profitability of the enterprise accommodated within the buildings rather than the market value of the buildings. Therefore, it should be noted that while the testing suggests that some types of development are not viable or marginal, developments of these types may still be brought forward for individual occupiers to meet their specific requirements. In particular if development profit is reduced to a contractor return, then unviable sites are likely to be marginal or show a small overage.

B Class Uses – Offices, industrial and warehouses

- 8.5.3 The viability assessments indicate that all of these B class uses produce a negative residual value. There is no possibility of charging CIL. The lack of viability for B class uses is common across many areas of the country. However, it should be noted that in prime areas if profit is reduced to a contractor return of 6% then these become either viable or marginal – therefore it is likely that these types of development will continue to come forward if prime rents are achieved.

Table 8.4 Office

	Office Prime	Town centre office
Value per sq m	£3,279	£1,099
Costs per sq m	£3,289	£2,823
Residual per sq m	-£10	-£1,725
Land benchmark per sq m	£21	£40
Viability 'headroom' per sq m – theoretical maximum CIL	None	None

Table 8.5 Industrial/warehouse

	Industrial/warehouse Prime	Industrial/warehouse Town
Value per sq m	£1,499	£640
Costs per sq m	£1,515	£1,333
Residual per sq m	-£16	-£694
Land benchmark per sq m	£200	£150
Viability 'headroom' per sq m – theoretical maximum CIL	None	None

Retail uses

- 8.5.4 The viability of retail development will depend primarily on occupier demand and the type of retail being promoted. For this reason, we have tested different types of retail provision.
- 8.5.5 **Supermarkets and local convenience** – convenience retailing is defined as the provision of everyday essential items, including food, drinks, newspapers/magazines and confectionery; and within this category larger stores provide the range required for weekly shops and smaller stores provide more of a 'top-up' function.
- 8.5.6 Local convenience retail is considered sufficiently viable to support a theoretical CIL of £167 and supermarkets £169.

Table 8.6 Convenience retail

	Small local convenience	Supermarket
Value per sq m	£2,740	£3,428
Costs per sq m	£2,381	£2,896
Residual per sq m	£360	£532
Land benchmark per sq m	£192	£364
Viability 'headroom' per sq m – theoretical maximum CIL	£167	£169

- 8.5.7 **Town centre comparison** retail —whilst the values are higher than the development costs, the land values with high existing use values mean it is not viable for a CIL charge
- 8.5.8 **Retail warehouse** –the development is viable and able to support a theoretical maximum CIL of £168.

Table 8.7 Comparison retail

	Town Centre	Retail Warehouse
Value per sq m	£2,350	£2,596
Costs per sq m	£1,969	£1,928
Residual per sq m	£382	£668
Land benchmark per sq m	£955	£500
Viability 'headroom' per sq m – theoretical maximum CIL	None	£168

Other Uses

8.5.9 The other use tested is a budget hotel. Here, development is marginal and unable to support a CIL.

Table 8.8 Other uses

	Budget hotel
Value per sq m	£2,268
Costs per sq m	£2,214
Residual per sq m	£55
Land benchmark per sq m	£53
Viability 'headroom' per sq m – theoretical maximum CIL	£1

Other Uses

8.5.10 The viability testing has been based on the development expected to come forward and discussions with the development industry. It is acknowledged that there are other uses that could arise and it is recommended that the following approach is taken:

- A2 Financial and Professional Services – treat as A1 in viability terms as many of these uses are likely to occupy the same sorts of premises as some town centre retail.
- A3 Restaurants and Cafes – again treat as A1 in viability terms as many of these uses are likely to occupy the same sorts of premises as some town centre retail.
- A4 Drinking Establishments - again treat as A1 in viability terms as many of these uses are likely to occupy the same sorts of premises as some town centre retail.
- A5 Hot Food Takeaways - again treat as A1 in viability terms as many of these uses are likely to occupy the same sorts of premises as some town centre retail.
- Selling and/or displaying motor vehicles - sales of vehicles are likely to occupy the same sorts of premises and locations as many B2 uses and therefore the viability will be covered by the assessment of the viability of B2 uses.
- Retail warehouse clubs – these retail uses are likely to be in the same type of premises as the out of town A1 retail uses and covering the same purchase or rental costs.
- Nightclubs – these uses are likely to be in the same type of premises as A1 town centre retail uses and covering the same purchase or rental costs.
- Scrapyards – there may be new scrapyard/recycling uses in the future, particularly if the prices of metals and other materials rise. These are likely to occupy the same sorts of premises as many B2 uses and therefore the viability will be covered by the assessment of the viability of B2 uses.

- Taxi businesses – these uses are likely to be in the same type of premises as A1 town centre retail uses and covering the same purchase or rental costs. Therefore, they are covered by this viability assessment.
- Amusement centres – these uses are likely to be in the same type of premises as A1 town centre retail uses and covering the same purchase or rental costs. Therefore, they are covered by this viability assessment.
- For community facilities that are ultimately paid for by the public sector such as community centres, health centres, hospitals and schools there is a relatively simple approach. The commercial values for community uses are £0 but there are build costs of around £2,400 to £2,900 per sq m plus the range of other development costs; with a net negative residual value. Therefore, we recommend a £0 CIL for these uses.
- Farm shops and garden centres are treated as other out of centre retail. It is anticipated that small scale ventures using existing buildings would not be liable for CIL while larger retail complexes in new permanent buildings would pay the out of centre retail rates.

8.5.11 Tourism is an important part of East Devon’s economy. Regarding holiday accommodation we take the following approach:

- If the development consists of standard dwellings that the purchaser intends will be used for holiday accommodation then it would pay the standard residential CIL rate applying in that location
- If it is a single new build being used for holiday purposes it would likely come forward as custom/self-build and therefore CIL exempt

8.5.12 Holiday parks are not specifically included in the testing as generally there is little evidence and they will vary hugely e.g. scope and scale of common facilities as well as the type of accommodation – from wooden lodges to more permanent structures. In addition, holiday homes are liable for VAT while new residential dwellings are not. This means that depending on the owner’s tax status, the build costs will be 20% higher. It is assumed that holiday parks will be part of the ‘All other uses category’ which is typically zero rated, and examples of this approach include the Cornwall CIL⁵⁹.

8.6 Summary and ability to support a CIL charge

8.6.1 With the exception of town centres, retail development can support a CIL charge. The table below shows both the maximum CIL charge and the CIL charge which could be set if a buffer of around 50% of the maximum possible charge was applied. A 50% buffer is suggested as there is a wide variance in costs and values with non-residential development and uncertainty in respect of anticipated S106 requirements.

Table 8.9 Potential non residential CIL rates

Use	Maximum CIL £ per sqm	CIL with a 50% buffer £ per sqm	Recommended rates
Retail (out of centre)	£167-169	£84	£84
All other non residential uses	None	£0	£0

⁵⁹ <https://www.cornwall.gov.uk/media/31809834/final-report-to-cornwall-council-cil-mar-2018-pdf.pdf>

- 8.6.2 East Devon's current CIL has a single rate of £173.89 for all retail development outside of town centres and Cranbrook. The retail sector is not as strong as it was and with greater development costs it is clear that the rate will need to be reduced from current level. For consistency it is recommended that a single CIL rate is used for out of centre retail but that this is reduced from the current rate to £84 per square metre.
- 8.6.3 The decision on the level of CIL needs to be informed by this evidence but ultimately taken by East Devon District Council. In theory, the amount a scheme can afford to contribute CIL is to a maximum of all of the difference between the residual value and the threshold land value after taking into account all costs. However, it is clear from the guidance that it is not appropriate to charge up to the maximum viability headroom in order to allow for margins of error and the likelihood of different costs and values affecting different locations and sites.

9 Summary and conclusions

- 9.1.1 Based on the viability testing and with suitable buffers and reasonable tests we have recommended a set of residential CIL rates that represent an increase on the current indexed rates, but still comfortably within the viability headroom. Within this, some of the uses that were not identified in the current schedule (older persons housing) now have lower recommended charges.
- 9.1.2 We have also tested the expected forms of non-residential development and this has confirmed that retail is the only types of development with enough viability to support a CIL. However, retail viability is weaker than it has been in the past and as a result the recommended rates are lower than the current indexed CIL.
- 9.1.3 Development of the expansion areas for Cranbrook has been viability tested, based on the requirements in the draft DPD and masterplan. This testing suggests that the development will be viable with a lower rate of affordable housing and a developer return around the middle of the range suggested by PPG (reflecting the lower risk of continuing the already established new settlement). Development of the expansion areas for Cranbrook will not be able to support a CIL, and it is recommended that this applies to all development in this location.
- 9.1.4 Where strategic sites may have to provide additional infrastructure through s106 under a revision of the r123 list then the potential CIL rates for these locations are lower than the general recommended rates. We suggest that this would apply to sites allocated for development by the Council except for Cranbrook which has its own rate. There is also the option to set a lower or £0 CIL rate for strategic sites if the Council is concerned about risk to delivery on these sites under proposed changes to new CIL regulations.
- 9.1.5 The recommended residential and non-residential CIL rates are:

Table 9.1 Current and potential residential and non residential CIL rates

Type and location of development	Current indexed CIL rate £/sq m	Proposed new CIL rate £/sq m
All development in Cranbrook	£80.09	£0
General residential development in Sidmouth and Budleigh Salterton	£147.23	£200
General residential development elsewhere in East Devon	£94.23	£150
Sheltered housing, extracare housing and care homes ^(a)	£0-£147.23	£0
Rural Exception Schemes in East Devon (Local Plan Policy 35)	£94.23	£0
Allocated strategic sites with additional s106 costs in Sidmouth and Budleigh Salterton	£147.23	£175
Allocated strategic sites with additional s106 costs elsewhere in East Devon (except Cranbrook)	£94.23	£100
Retail (out of centre) ^(b)	£176.67	£84
All other non residential uses	£0	£0
<p><i>Note that the comparison between the current and recommended rates is to inform the Council's decision and that the use categories for the current CIL and the recommended CIL may not always be exactly the same – for example the current charging schedule the current charging schedule refers to "residential" which the Council has been implementing as C3 use, which may not be directly comparable with the recommendations for sheltered/extra care which may be C2 or C3.</i></p>		

Table 9.2 Notes on proposed CIL charges

Ref.	Notes
(a)	<p>These uses are defined as follows:</p> <p>Retirement housing - This is often known as “Sheltered Housing” or “Retirement Living”. Retirement Housing usually provides some facilities that you would not find in completely independent accommodation. These can include (secure main entrance, residents’ lounge, access to an emergency alarm service, a guest room. Extra facilities and services are paid for through a service charge on top of the purchase price or rent. To move into retirement housing, occupants are assumed to be independent enough not to need care staff permanently on site.</p> <p>Supported housing - This is often known as “Extra Care Housing” or “Assisted Living”. Everyday care and support will be available. Facilities will include those available in retirement housing plus others (such as a restaurant, communal lounges, social space and leisure activities, staff on site 24 hours a day). Service charges are likely to be higher than in retirement housing but this reflects the more extensive range of facilities.</p> <p>‘Care homes’ are defined as residential care homes or nursing homes where integral 24 hour personal care and/or nursing care are provided together with all meals. A care home is typically a residential setting where a number of older people live, usually in single rooms and people occupy under a licence arrangement.</p>
(b)	<p>Applies to qualifying floorspace outside of town centres and to all retail development within A use class.</p>

9.1.6 The analysis in this report has used current values and costs. But we and the Council are aware that both can change over time. It is important that the Council keeps values and costs under review. We recommend that the main build costs and market and rental values are monitored regularly (at least annually) using published sources and that the development industry is consulted on these and other changes that can affect viability (e.g. interest rates and developer returns). A sustained change in the key variables should trigger a review of CIL and/or the affordable housing policy. In any case, the Council should consider a regular review of CIL (say in 2-3 years’ time) but noting that a review does not have to lead to a revised rate.