



Broadclyst Parish Council
19 New Buildings
Broadclyst
Exeter
EX5 3EX
08/01/2018

Dear Sir/Madam

Ref: Cranbrook Development Plan Document (DPD)

Thank you for consulting Broadclyst Parish Council on the Cranbrook DPD; this response comprises the views of elected Members and the local community who have been eager to share their views with Council, for which we thank them.

The Broadclyst PC response focuses, not unsurprisingly, on the western expansion zone and the general future development of the town, including infrastructure. Specific comments on the southern and eastern expansion zones have not been made; this is because it was felt that Rockbeare and Whimble parish councils were respectively best placed to make those comments.

The DPD will inform the shape of Cranbrook town and as a neighbouring parish we are keen to support the town as it develops, bringing increased leisure, retail, and employment opportunities to the wider locale, as well as providing core community services such as youth provision, library, and sports facilities. Essential provision including educational and medical centres will offer increased choice to Cranbrook's many satellite villages, drawing neighbouring parish residents into the town which will support its economy.

HIGHWAYS INFRASTRUCTURE

In writing the opening general section of this response we have first considered the B3174, and what the town needs it to be. There are two options: firstly, that it remains what it is now – an open and fast route to transport vehicles in to and away from the town. If this is to be the case, development along the whole length of its frontage should be largely residential, separated from the road itself by substantial landscaping including Devon banks, with formal crossing points. Junctions feed into developments either side of the road, and the town is effectively divided by the road, with the majority of housing and facilities lying to its north.

This pattern is demonstrated in Exmouth, where the A376 has key spur roads (Gipsy lane feeds Exmouth Community College and Phear Park; Exeter Road and Imperial Road serves the town centre), but much of the traffic bypasses the town centre and carries on round to the sea front.

The alternative to this, is for the B3174 to become an integral part of the town - an extension of the High Street - in which case its frontage should be urbanised and open, comprising a mixture of residential, retail, and small business properties. This arrangement has the advantage of the road

not dividing but uniting development parcels to its north and south, its urbanised nature slowing traffic down. The A30 provides a by-pass for the town, with easy access to it within a few miles either way at Daisymount and the Clyst Honiton bypass. This is more typical of road layout and use in a small town, and many local examples exist, including Honiton.



Figs. 1 &2: examples of urbanised and slower main routes passing through a built-up area such as Whipton (above) or Cowick Street (below) – both in Exeter



Given there are several established residential properties fronting immediately onto the B3174 at the Jack in the Green end of Rockbeare Straight (shown below), and that SkyPark and Hayes Farm will feed onto the B3174, there is an argument for the B3174 to become more urbanised.



However, keeping in mind that the eventual size of Cranbrook will put it akin to that of Barnstaple, there will need to be routes through the town which will allow the flow of incoming/outgoing and commuter traffic at relative speed, avoiding the congestion which inevitably occurs on urbanised routes. Such routes are best segregated from residential areas, accessed by few junctions/roundabouts rather than lots of smaller entrances/exits from private residences.



Fig. 3 (above): example of a commuter route which will should remain faster and 'uncluttered' by on-street distractions. Retail and residential developments are separated from the road by landscaping and screening. (shown - Eastern Avenue in Barnstaple).

Fig 4 (below) is also from Barnstaple, taken just yards from Barnstaple town centre and the North Devon hospital, and demonstrates how the A39 separates traffic from residential properties yet provides dedicated foot and cycle links with other green infrastructure paths.



In these early days of Cranbrook, it is not easy to recognise its eventual needs; care must be taken to provide a future-proof infrastructure network. The need to move volumes of traffic through and into/out of the town needs to be balanced with the disbenefit of the road potentially dividing the community and the commercial viability of 4 smaller neighbourhood centres rather than two larger ones.

On balance, we believe the B3174 should not be urbanised but should be a faster-moving commuter route, as per its existing design from the airport roundabout to the E.on building. Therefore, it would not be appropriate to introduce neighbourhood centres straddling the road, as indicated at Bluehayes/Treasbeare and Cobdens/Grange; such centres should be placed away from the B3174 within each parcel, at locations of most benefit to its immediate residents.

Once road style is established, this will naturally inform the type of development immediately along its frontage; whatever pattern is decided should be applied along its length and will set associated driving styles. Town 'gateways' can be discerned through landscaping and statement buildings immediately off the B3174.

GREEN INFRASTRUCTURE AND PUBLIC TRANSPORT

Regardless of the style of the road network, provision for non-vehicular and public transport should be built-in to discourage reliance on and use of the private car. Bus lanes and safe GI links are key, not just within Cranbrook but radiating out from and linking with neighbouring towns and villages in all directions (not just towards Exeter). Proposed GI routes in the DPD need to be amended to match the highest footfall routes and link to the areas of highest density.

Cranbrook Railway Station is the nearest station to the Exeter International Airport; a direct bus service, also serving the Exeter Airport Business Park, could be of commercial benefit to the area and should be explored.

EDUCATION

The expansion zones bring forward new primary schools, yet there is uncertainty around the capacity of existing secondary education at the Cranbrook Education Campus (CEC), with it being stated at the launch meeting at EDDC that pupils in the western expansion zone would feed into Clyst Vale Community College (CVCC) rather than the CEC. Geographically this may indeed make sense, as CVCC will be closer than the CEC, however the following should be kept in mind when masterplanning on this assumption:

1. Station Road (the only vehicular link between the western end of Cranbrook and Broadclyst village) is dangerously unsuitable for pedestrians and cyclists; this is evidenced by Devon County Council (DCC) providing pupils along its length with free bus travel to school in Broadclyst village despite them residing within 3 miles of the school (below which is the normal cut-off criteria for funding)
2. In the early days of Cranbrook when it was going to be a 3,500 homes development, CVCC reduced its PAN (Pupil Admission Number) as it was felt that a secondary school would not be necessary for Cranbrook and that Cranbrook students would attend CVCC. Since the increase in the size of Cranbrook and subsequent building of the CEC, CVCC has upped its

PAN back to what it was before, and now is to provide secondary school places for students living in new strategic site developments elsewhere in the Growth Point at Westclyst, Tithebarn Green, and Mosshayne. It quite possibly does not have capacity for these students, let alone more from Cranbrook's westernmost primary; this is a conversation which should be carried out with the DfE and DCC before Planning for education provision can be finalised.

3. Should it transpire that western expansion zone pupils will attend CVCC, improvements to Station Road and/or provision of a safe cycle/footpath (including crossing the railway) must be secured through a Section 106 agreement, not left to the luck of the draw with CIL funding.

BROADCLYST STATION

The Cranbrook Masterplan document contains no reference to the community of Broadclyst Station, based predominantly along Station Road. Whilst still located within the Broadclyst Parish boundary, the residents along Station Road live in what is essentially a hamlet, their properties divorced from Broadclyst by the railway line. There is a strong sense of community along this road and residents are anxious not to be subsumed into the Cranbrook development.

Consideration has clearly been given to the need for separate communities within the masterplan document. Page 18 states "Although development encroaches into the green wedge to the north of Rockbeare its location maintains a clear visual separation between Rockbeare and Cranbrook which is the purpose of the green wedge." Preferred options 2 and 4 on page 6 both emphasise the importance of the gap between Cranbrook and Rockbeare. Perhaps because it is a much smaller community than that of Rockbeare the long-established community at Station Road appears to have been dismissed, forgotten and passed over, unrecognised and not mentioned whatsoever throughout the Cranbrook DPD.

We respectfully refer to comments made by Broadclyst Station residents submitted directly to EDDC, and ask that the points raised within are given due consideration. The common theme throughout the consultation is the lack of recognition for Broadclyst Station as a settlement and established community in its own right; lack of facilities - whilst 'unsustainable' on paper - does not make it any less of a community.

Density, sensitivity and coalescence.

High density development immediately adjacent to existing properties along Station Road will result in a loss of "place" and sense of community; this is [largely] unacceptable to residents. The National Planning Policy Framework (N.P.P.F.) explains that there are three dimensions to sustainable development: an economic role, a social role and an environmental role. Of particular concern here, is whether consideration has been given to the "social" aspect when masterplanning the Bluehayes expansion parcel, having regard to the existing "strong, vibrant and healthy community" at Station Road. We suspect that the needs of the existing community have not been given sufficient consideration and ask that the identity of this established community be respected in the same manner as Rockbeare.

The fact that Bluehayes is the least sensitive area should not affect the need to develop this parcel of land in a sensitive and sustainable manner, acknowledging and respecting the identities of the

established community at Broadclyst Station. Whilst it is accepted that development will take place in the Bluehayes parcel, the plans for development should include a buffer between the established and new communities. This was proposed originally but has since been omitted from the plans.

In addition to a buffer, we would suggest that the higher density housing, e.g. blocks of flats and tallest buildings should only be designed into the centre of this area of expansion as per figure 6.1 of the DPD rather than at the fringes to lessen the impact of the development on the existing settlement. Where new housing meets existing, the juxtaposition of the two developments should be such that no significant difference is discernible.

BROADCLYST NEIGHBOURHOOD PLAN

The Broadclyst Neighbourhood Plan Area is the parish boundary, and the Steering Group is considering responses to the Call for Land from landowners the length and breadth of the parish as the Plan is written.

EDDC cannot change the Broadclyst Neighbourhood Plan Area without Broadclyst Parish Council's consent. A change in the parish boundary does not change the neighbourhood area. Under S61G(6D) TCPA1990 (and as applied by S38C PCPA 2004) a modification of a Neighbourhood Plan Area does not affect the continuation in force of a Neighbourhood Development Order or Neighbourhood Plan even though as a result of the modification

- (a) it no longer relates to a neighbourhood area, or
- (b) it relates to more than one neighbourhood area.

The emerging Broadclyst Neighbourhood Plan for Broadclyst includes the Broadclyst Station community and the land in the Station Road area. The Neighbourhood Plan is developing at some speed now and has brought forward potentially exciting opportunities which will enable the delivery of projects on the community's 'wish-list'. It is imperative for the delivery of these and more strategic projects that Broadclyst Station and Station Road retains its identity, rather than being subsumed into Cranbrook, which appears to be intention from the DPD.

The employment sites of at SkyPark, Lidl, and Hayes farm, whatever final format they take, will draw in a huge workforce from the surrounding area. It is not unrealistic to suppose that a good percentage of staff will come from Cranbrook and Exeter, and will travel along the improved B3174. However, it is likely that a not inconsiderable number workers will live in a wide catchment area to the north of the B3174, including the large villages and towns of Broadclyst, Bradninch, Silverton, Thorverton, the southern end of Cullompton (and the proposed new development to the south of Cullompton), and they will commute via Station Road as the most direct route. We are looking at what improvements are realistic for Station Road as well as talking to Greater Exeter Strategic Plan (GESP) Officers about alternative routes for some parts of the road.

Land at Broadclyst Station is a key strategic area for the Plan and is critical to its implementation. If there was coalescence of the two areas it would result in the emerging Neighbourhood Plan having to be revisited and a loss of momentum and good will from residents of Broadclyst. This could be avoided with appropriate buffers.



Evidence collected during our Neighbourhood Plan community consultation events has shown that local residents have deep concerns about Station Road as the west end builds out; over 1,000m of queuing traffic is regularly seen at peak times, stacking back past the railway bridge from the B3174 / Station Road junction

Station Road junction with B3174

As the Neighbourhood Plan and the GESP come forward in their draft form, the potential for re-routing and/or closing the southern junction of Station Road with the B3174 will be strategically considered. Reliance upon the existing layout remaining as it is should, therefore, be minimalised; we look forward to working with strategic planners to make necessary changes to existing infrastructure which will benefit vehicular and non-vehicular movements that are not just east-west but also north-south.

GYPSY AND TRAVELLER SITE

It is accepted that a static gypsy and traveller site is needed and will be provided within Cranbrook. Already having a long-established static gypsy site on the fringes of Broadclyst village, where its residents have been part of the village community for generations, Broadclyst Parish Council has no immediate concerns over a managed static site of an appropriate size (no more than 6 pitches), being provided at the western end of the town, however the location needs careful consideration.

The land proposed in the Bluehayes parcel for a Traveller site lies within Broadclyst Parish and is therefore within the Broadclyst Neighbourhood Plan Area (see paragraph above). Neither EDDC nor the Consortium has an option over the land identified in the DPD for a gypsy/traveller site, and indeed that the owner may be unwilling to sell the land. The site is therefore not deliverable in the short to medium term and we would question why EDDC would plan to allocate undeliverable land, and why land within the Broadclyst Neighbourhood Plan Area is being Masterplanned by an authority other than the Qualifying Body (i.e. Broadclyst Parish Council).

The implication is that EEDC will make a compulsory purchase order for the land in order to achieve the development; we suggest that land elsewhere should be considered, for example, adjacent to

commercial developments (such as the permanent static site just off Avocet Road in Sowton Industrial Estate, Exeter), and possibly in the Treasbeare parcel. This site would still be on the edge of the town and close to local services. Whilst not having direct access onto the B3174, the site could be located next to a primary movement route within the site with easy access onto London Road. We believe this aspect of the design should be revisited.

Furthermore, we do not consider it appropriate for a transit site to be located near any residential areas of the town, nor - due to the larger acreage of land required - do we believe there is sufficient land availability / space for a yard of Showman plots to be provided in the town.

CRANBROOK DPD QUESTIONNAIRE

Specific questions within the published questionnaire seem to have been answered in a thorough and detailed manner by Cranbrook Town Council, and we see little point in repeating what the Town Council has said.

The Town Council has utilised its historic knowledge when responding to the questionnaire, using evidence-based facts as well as an educated insight as it outlines changes and processes that will be necessary for the eventual delivery of a thriving town.

We echo Cranbrook Town Council's comments in relation to: Part B - Culture and Community, Economic Development, Gypsy and Traveller provision, and Airport Safeguarding; Part C – Design principles; Part D – Masterplan for all parcels (save for future strategic negotiations through the Broadclyst Neighbourhood Plan for north-south infrastructure links at Bluehayes); and Part E. With regard part E, the parish council is very concerned that across the Exeter and East Devon growth Point (not just Cranbrook) CIL receipts are going to be insufficient to deliver even a fraction of the necessary infrastructure associated with and required by this level of development. The application process is unnecessarily complex and the pot of money nowhere near large enough; we must ensure we are building communities, not just bricks and mortar.

Yours Sincerely

AMS Hurren

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Broadclyst Parish Council Manager

Photo credit: Google maps street view; Broadclyst Neighbourhood Plan evidence base.