

## Introduction

Cranbrook Town Council objects to two proposed changes to the local plan, both in Strategy 12 starting on page 55:

- The first set of objections is to change reference 08, which reads as follows: “An additional criteria to be added to Strategy 12 (between Criterion 1 and Criterion 2): 1b. Gypsy and Traveller Provision - provision will be made for new gypsy and traveller sites to accommodate up to 30 pitches on land allocated for Cranbrook development. Provision will be required concurrently with (though in the early years of) the ‘bricks and mortar’ housing development of the allocated land.”
- The second objection is to the removal of the requirement for Cranbrook to be built to “eco-town standards”. This is not listed in the change summary table and as such has no change reference number.

## Objections

Details of the reasons for the council’s objections are given in the table below.

| Change Ref | Objection  |
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| 08         | <b>High density in one location:</b> This proposed change allocates up to 30 pitches in one small area, the Cranbrook development. In addition it requires that the pitches are required ‘in the early years’ of the development, which further limits the parts of Cranbrook that would be suitable. This is a very small part of East Devon. This allocation has been made before any review of the capacity, percentage occupation and potential for expansion of existing sites has been made. No other area has been proposed for these sites, despite potentially suitable council owned land being available, for example in Honiton. The town council therefore feels strongly that to refer to a specific area so early on in what should be a lengthy and considered process is unreasonable and unjustifiable.  |
| 08         | <b>Prejudges and contradicts existing EDDC plans:</b> This proposed change contradicts the gypsy and traveller plan which is still being produced and is not due for examination until June 2016. This states that a call for sites will take place with the aim of “establishing a range of potential site options to consider”. (Point 3.1). By writing the vast majority of the sites into the local plan in one area, this change is prematurely bypassing this process. Changing the local plan in this way could expose the council to high land purchase prices due to a lack of competition between different site owners or by discounting existing council owned land. It makes a mockery of the democratic process, given the objections raised by Cranbrook Town Council to the traveller and gypsy plan.<br>Also in the gypsy and traveller plan is the recommendation that “smaller sites work best and it is advised that no site |

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|    | <p>should exceed 15 pitches” (Point 3.11). Clearly by siting 30 pitches in one location this local plan change is ignoring this recommendation.</p> <p>It seems a wasted effort to commission a gypsy and traveller plan only to ignore its recommendations and processes when writing the local plan. It is unreasonable for one area of East Devon to absorb almost the entire requirement for gypsy and traveller pitches without any other sites having even been considered. East Devon District Council may argue that this provision is not set in stone and that the ‘call for sites’ and other processes can still go ahead despite this local plan change. The reality is that the likelihood of this happening if the local plan change is approved is very small. The gypsy and traveller document makes provision for local plan changes in point 6.1 stating that “It is possible that [the local plan inspector’s] recommendations, if endorsed by this Council, could negate the need for a separate gypsy and traveller plan”. Essentially this point means that if the local plan change is approved and Cranbrook chosen for the site of up to 30 pitches, the separate gypsy and traveller policy could be abandoned by East Devon Council. This would remove any need for consideration of other sites in the foreseeable future.</p>  |
| 08 | <p><b>Disproportionate allocation:</b> Policy H7 - Sites for Gypsies and Travellers - as amended, states that in the period up to 2034, 37 gypsy and traveller pitches and 3 plots for travelling show people should be provided. During the first 5 years, from 2014-2019, at least 22 of the gypsy and traveller pitches should be provided and 1 of the travelling show people’s plots (with this to be accommodated on an existing permitted site with spare capacity at Clyst St Mary). Again there is no differentiation between sites for gypsy families and traveller families and this needs to be clear with proposed allocations for each group. However it is considered that at least a reasonable proportion of the 37 pitches would be for expanding local gypsy families.</p> <p>Much is made in the commentary by East Devon District Council about need being concentrated in the west of the district. This may be so for traveller provision but this is not the case for gypsy families who are spread throughout the district; therefore their need is spread throughout the district. Cranbrook Town Council therefore refutes this assertion and requests that the need be more carefully analysed.</p> <p>It is proposed that strategy 12 should set out in unequivocal terms the number requirement of pitches for gypsy families and this be spread more equally through the district. It is wholly inaccurate and disproportionate to amalgamate the gypsy and traveller need into a single figure and then locate the bulk of that in Cranbrook on the erroneous basis that the need is in the west end. The need for traveller stopping sites may be in the west end, the gypsy site requirement is not. Another point which seems to have been missed is that even if the need is in the west end, the pitches provided do not have to be. The document ‘Devon Partnership Gypsy and Traveller Accommodation Assessment 2015 - Final Report’ by RRR consultancy states that “accommodation needs <u>do not</u> have to be met where it arises” (page xix). Thus by using the argument of need to claim that the majority of the pitches must be in the west end East Devon District Council are guilty of cherry-picking the recommendations of their own consultants.</p> |

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|    | By lumping such a high proportion of sites in one location without proper consideration of other areas it is possible that the process leading to this local plan change would fail a judicial review; certainly a number of residents feel this to be the case.  |
| 08 | <p><b>Contravenes national gypsy and traveller policy:</b> In proposing 80% of the traveller and gypsy pitches in just one part of East Devon, this proposed change to the local plan contravenes the Department for Communities and Local Government policy paper ‘Planning policy for traveller sites’ which states:<br/> “Local planning authorities should, in producing their Local Plan, relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population’s size and density”. (Section 10 d, page 3).</p> <p>Cranbrook Town Council objects to such a large number of pitches. To go forward with this change to the local plan despite these objections clearly ignores the recommendations in this same document to “ensure that..policies promote peaceful and integrated co-existence between the site and the local community”. (Section 13 a, page 4).</p>  |
| 08 | <p><b>Meeting needs and lifestyle:</b> Throughout the process of consultation the council has continually referred to “gypsy and traveller sites’ and it is considered that this is both confusing and potentially misleading. The two groups are quite different and require different provision. This is clearly stated in the ‘Devon Partnership Gypsy and Traveller Accommodation Assessment 2015 – Final Report’ which went on to recommend that any new provision be separate and remote from existing gypsy sites.</p> <p>Any strategic proposal within the local plan needs to be clear about whether it is referring to provision of sites for gypsy families or whether it is referring to the provision of sites to accommodate the needs of the traveller community.</p> <p>East Devon has a number of existing gypsy sites. Most are privately owned, small in size (between 1 and 5 pitches with the majority 3 or less) and situated in rural or semi-rural locations. The sites tend to be occupied by a single or extended family. The families are integrated within and part of their local community.</p> <p>The accommodation assessment indicated a need created by expanding local gypsy families and it is wholly appropriate that a new settlement such as Cranbrook has provision for local gypsy families. Strategy 12 should therefore set out clear and unequivocal proposals for a number of small gypsy sites of between 1 and 5 pitches. Like the current policy on affordable homes, these should be provided on a “pepper pot” basis to facilitate better community and neighbourhood integration.</p> <p>The traveller community is by its very nature irregular and transitory. The accommodation assessment referred to need within the west of the District and for the travellers this is accepted because of the location and orientation of the major trunk routes of A303 and M5 and the evidence of the recent encampments that have occurred adjacent to these routes particularly around Sky Park and Science Park.</p> <p>There is a need for Strategic allocations to meet the traveller need. But this will not be met by the creation of a large</p> |

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|    | <p>transit site in Cranbrook. If there is an assumption that Cranbrook will accommodate new gypsy site provision, it would be wholly wrong to locate a traveller site in the locality. It is well documented that the two communities should not be co-located and this is supported by the accommodation assessment.</p> <p>By their nature, travellers do not tend to stop at formal and managed sites. They have a preference for a more flexible and unmanaged lifestyle and would be most likely to continue to use unauthorised sites even if a formal traveller site were to be created. It is recommended therefore that a small number of informal stopping sites be identified which are remote from established or proposed gypsy sites. These informal stopping sites should be located on or near trunk routes and draw on the experience of current preferred locations.</p> <p>The proposed strategic location of pitches is not clear from the amendment. However there is a suggestion (which may or may not be true) that land on the southern expansion area be allocated which previously was proposed as employment land because of its proximity to the airport runway. It is considered that it would be inappropriate to allocate land for pitches (whether gypsy or traveller) which is not suitable for conventional homes.</p>   |
| 08 | <p><b>Social and Economic impacts:</b> Cranbrook is a success which has been recognised by a series of industry awards. Rate of development and sales are high with much continued interest. In essence the developers have difficulty in keeping up with demand. Some 1200 families have invested in Cranbrook to date and this is increasing at a rate of around 350 new families a year. Those who live in Cranbrook today have invested in and bought into a vision for the town that they want to live in. It is this vision that will continue to attract new families.</p> <p>Cranbrook has provided so many local people with an opportunity to have their own home. This is something that they might not have been able to do otherwise simply because house prices and availability in other parts of East Devon are out of reach. Cranbrook has contributed considerably to the housing needs of the district and substantially reduced the council’s housing waiting list.</p> <p>Much has happened in Cranbrook to build a sense of community. Working with the Growth Point team, developers and other partners, members of the community have built a framework that has created a strong sense of community and a feeling that people enjoy living in Cranbrook. This is clear from the regular community surveys as well as a great deal of anecdotal evidence.</p> <p>The wording of the proposed strategy, in suggesting that up to 30 “gypsy and traveller pitches” be located within the town, has given rise to a considerable adverse reaction in Cranbrook. Rightly or wrongly, the proposal, as stated, paints a rather unfortunate picture which is having an adverse effect on Cranbrook as a place to live.</p> <p>The lack of clarity in the proposed strategy provides little or no information about the location and scale of the site or sites and therefore the public, quite naturally, are fearing the worst. The likely impact of this is that if a large site or sites are created in the town the social integration would potentially be very poor and there is also a fear that property values and future sales would be adversely affected.</p> |

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|    | In order to retain community cohesion, property values, future sales and the future wellbeing of the town, any proposals should be clear about their provision (gypsy or traveller), provide for one or the other, not both, be proportionate in their nature and be provided in such a way to as to facilitate integration.   |
| 08 | <b>Effects on Provision of Facilities:</b> Provision of facilities within Cranbrook is linked in planning permissions to a number of conditions including the number of houses. Gypsy and Traveller pitches are not included in this total. Any delay in housing provision would thus result in delays in provision of important facilities which will impact negatively on both new and existing residents. Cranbrook Town council envisages two potential sources of delays in housing provision as a result of this proposed change. The first is the effect of diverting effort and resources to pitch provision rather than housing. A second effect is a reduction in demand for housing as a result of the poor publicity that this proposed change is generating. There is no consideration of this effect in the proposed plan.   |
| 08 | <b>Effects on Education:</b> EDDC seem to have completely overlooked the need and provision for education as part of this proposed change. Cranbrook currently has two schools to accommodate the children that would naturally be part of any gypsy and traveller site, St Martin's and the Cranbrook Educational Campus.<br>St Martin's is already working at capacity. This is a school that already has a significantly high proportion of children with varying degrees of special educational needs. The free school meal numbers have been and are well above averages in Devon. Last year their Standard Assessment Test scores were well below national averages. This proposed change will automatically create a further drain on the resources available and education standards will become a continuous uphill battle to maintain.<br>At the new Cranbrook Education Campus, the current intake have over 50% of pupils either on or at school action and school action plus. Both schools attract a disproportionately high number of pupil premium children. This is likely related to EDDC's role in developing a town with a very young demographic. Many young families have been encouraged to Cranbrook through the affordable housing schemes and provision of social housing. However, this situation will always bring with it a number of challenging circumstances for schools that cannot just be ignored. Research clearly shows that social deprivation, under performance and problems in education are often uncomfortable partners that planners, educationalists and local authorities have to face. Many of the children in both schools have high levels of behavioural, emotional and social needs. Both schools continually have to look at resourcing these needs and the drain on budgets and adverse effects on educational standards is very easy to research.<br>According to the government research paper 'Improving the outcomes for Gypsy, Roma and Traveller Pupils', under performance is rife throughout these communities. Engagement, attendance, exclusion and lack of interest are just a few of the highlighted problems found when looking at educational provision for gypsy and traveller children. It is concerning that the change to the local plan appears to have disregarded such an important issue. |

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| No ref | In the 'Vision for East Devon to 2031', Cranbrook is referred to as a 'prototype eco-town' (section 3.8 a, page 19). However this claim is meaningless now that the need for Cranbrook to be built 'to eco-town standards' has been dropped in this proposed revision. It is misleading to continue to make such claims whilst simultaneously downgrading environmental requirements for future development at Cranbrook. |
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