

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

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

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Independent Examination to Cranbrook Local Plan 29 November 19

Matter 1 Legal Compliance including the duty to co-operate.

Issue 1

- Q2. The Local Development Scheme 2018 is not extensive enough to have an effect on the Cranbrook Plan. As the local development scheme is defective it cannot be said that the plan has been prepared in accordance with the scheme development.
- Q3. It is denied that the plans have been prepared in accordance with the Council Statement of community involvement SC1 and has met the requirement for regulation 22 of the Town and Country Planning (Local Planning) Regulation 2012 as amended by Local Plan Regulations. The council statement of community involvement is ineffective but not comprehensive.
- Q5. The Plan delivery of the green wedges would protect the integrity of Wimple and Rockbeare.
- Q6. It is denied that the plan is legally compliant with the provisions of the Planning and Compulsory Purchase Act 2004 which gives particular attention to the sustainability appraisal dated 2017 and the development strategy and the statement of the community involvement.
- Q7. The Local Plan is not legally compliant with respect to the sustainability appraisal.
- Q11. There is no clear indication within the system and the policies that there are any precise terms of anticipation and response regarding long term requirements. There is no long term planning in the area for major improvements to infrastructure.
- Q12. The Plan period 2013-2031 is not justified. As we are in 2020 there are only 11 years left with reference to this forward planning. The planning period should be extended to 2038.

Issue 2 Duty To Co-Operate

- Q13. Transport accessibility into Exeter from Cranbrook is critical. There is no indication that the rail and the infrastructure will be at upgraded by the current operators. The increase in population in Cranbrook will put an unbearable load on the transport into and from Exeter. Exeter is not providing in any form a five year supply of transport accessibility.
- Q14. There is no synergy between this plan and the Exeter strategic plan.

- Q15. There appears to be no effective co-operation with the surrounding villages of Whimple Rockbeare and Pinhoe regarding the environmental impact of destroying the cultural framework of those villages and essential incorporating them within the culture and framework of Cranbrook.
- Q16. It is not known what the viability talk kit questions are nor has this been compromised by the Duty to Co-Operate clause.
- Q17. There is a failure in the effectiveness of the DDTC in communication with interested parties.
- Q19. There are no items of fact which support the number of housing planned within the Development Plan other than the maximum capacity a Developer can build. There is a fundamental flaw in the assessment.
- Q20. It appears that any co-operation with the neighbouring councils of Rockbeare Whimple and Pinhoe have not influenced the preparations of Cranbrook local plan.
- AQ2. A more effective document is required with the duty to co-operate DTC to ensure that the plan will comply with a duty to co-operate with surrounding villages.

Matter 2 The Soundness of the Local Plan

Issue 3 Is the Plan Based on a Sound Process of Sustainability Appraisal?

- Q22. The sustainability appraisal is defective.
- Q23. The DSA does not clearly justify the council's policy choices. The submission of facts within the SA document is extremely limited.
- Q24. The SA process does not represent the only site selection mythology. It is not known what other methods have been used other than there were other sites proposed.
- Q25. There is no apparent feasibility issued for public viewing which confirms the SA has been tested against reasonable alternative sites.
- Q26. There is no apparent publication of reasonable alternatives to be reviewed by the public.
- Q27. Meaningful comparisons cannot be made because there are no apparent comparisons and sustainability implications of feasibility with reference to Questions 25 and 26.
- Q28. Not able to comment because of the restrictions contained within questions 26 and 27.
- Q29. The Final Report does not set out the reasons for rejecting earlier options which make the report defective.
- AQ3. The sustainability appraisal report is required to be revised to show information which is factual and not based on provisional forecasts.

Issue 4 Is the Local Plan Justified, Effective and Consistent with National Policy in Respect of the Habitats Regulations?

- Q30. The Local Plan is not legally compliant with respect to the habitats regulations. As no feasibility with reference to conservation of flora fauna has been integrated by East Devon District Council. There is a requirement as the development in the middle of existing agricultural land for an appropriate assessment (AA).
- Q31. The position of natural England re the SOCG has not been finalised and the planning application ref: to the former site of Manston Kent is still undecided with reference to Thanet District Council and Kent County Council boundaries.
- Q32. There is a need for East Devon District Council to be constructive with reference to Table 2 of the HRA and how it affects the inclusion of the Cranbrook Plan in the area designated for building purposes.

AQ4 A proper assessment would be spent on the habitant's regulations and an appropriate assessment to be prepared. An assessment is required as to the position of natural England and the SOCG which has been ongoing for some years.

Issue 5 Is the Local Plan Justified, Effective and Consistent with National Policy in Relation to Climate Change?

Q33 There is no evidence within the Cranbrook Town Council Plan 2019/2024 inclusive of the East Devon Local Development Scheme and the Cranbrook in Common Cultural Development Strategy 2016/2026 inclusive of the Cranbrook Plan 2013/2031 taking into account the Sustainability Appraisal 2017 that there is anything contained within those documents will be effective in mitigating and adapting to climate change and supporting the transition to a low carbon future.

The only evidence is the communal power surface station which will supposedly provide energy to the new development. No proposals with reference to this have been forthcoming. The transport provisions within the documents are restrictive and contain no firm proposal at all with reference to transition to a low carbon future. Within documents submitted no sufficient provision has been made within the special development strategy or the local development scheme which is of any consequence.

Q34 No long term provision has been made in the plan to address climate change and therefore is in breach of Section 19 (1a) of the 2004 Act.

Q35 No provision has been made for carbon offsetting.

Q36 There is no feasibility published as to whether the existing CHP Plan has the capacity to support the total number of homes that are proposed. There was evidence of failure within the CHP Plan with reference to the existing development at times.

AQ5 A proper assessment is required to address climate change in accordance with Section 19(1A) of the 2004 Act and that the existing service provisions provided are adequate for the proposed development

Matter 3 Housing Strategy

Issue 6 Is the Local Plan Positively Justified, Effective and Consistent with National Policy in Respect of Housing?

- Q37 The plan does not provide a choice to meet the needs of housing to meet the different groups in the community, there is no real identification within the Cranbrook Plan which indicates the mix. Within Cranbrook Common Publication 2016/2026 it states that Cranbrook is currently being occupied mostly by young families with parents aged between 23 and 35 and children under 5. East Devon has a much older age average. Therefore, there is no choice within the housing to meet the quota and needs of different groups in the community.
- Q38 The expansion area policies which are provided within the documents provided is extremely short of practical information and statements clarifying the type of environment, the types of property, the layout of the properties envisaged. There is no sufficient clarity and guidance of plan users and what is being provided is not adequate under the definition of sounds.
- Q39 It is not known whether the amount of housing proposed for Cranbrook will accord with the EDPP taking into account previously built home and those with planning permission. A planning application was submitted on the 28th June 2017 by Hallam Land Management in conjunction with Simmons Homes and Taylor Wimpey for the first development that is designated as Blue Hayes. This Planning Application is still live and it is not known whether it is additional to the Cranbrook Development or is it incorporated within it.
- QQ40 The housing figures given in the EDPP are not relevant with reference to the current financial and political climate.
- Q41 There is no justification for additional green filled sites at Cranbrook where existing ground filled sites within the district could reasonably meet the proportion of the need.
- Q46 There is no justification for a multitude of pitches incorporated in the expansion area to meet the needs of Gypsy and travelling communities. There is no evidence on the file that the travelling communities have been asked what their requirements are.
- Q47 There is no robust evidence within any of the documents submitted that infrastructure will be delivered at a sufficient rate and time scale to meet the housing targets. It is obvious that within Cranbrook Town Council Business Plan 2019-2024 that any finance with the infrastructure is based on developer's progress on completion of houses to provide funds for infrastructure i.e. the cart is going before the horse. There is no external finance available for the infrastructure inclusive of rail and road facilities.

- Q48 With reference to Question 37 - The plan does not make specific provision for housing needs of old and disabled people.
- AQ6 The main modification requirement is a proper evaluation of properties and housing required with the only provision in design which would increase quality and feasibilities and ensure that the housing allocation is not a developer led for profit participation only.

Matter 4 Bluehayes Expansion Area

Issue 7 Is the BlueHayes Allocation (Policy CB2) Positivity Prepared, Justified and Effective?

Q49 Item c There is no evidence that there is a provision for the necessary infrastructure of services and any environmental and requirements which will be in accordance with the Housing trajectory.

Q50 As contained in Cranbrook Town Council Business Plan 2019/2024 Flooding and Surface Water Drainage is subject to 106 Agreement between the Developers and East Devon District Council which is subject to a Deed of Variation. This has not been issued yet.

Q51 The mix-use allocation at Blue Hayes is not appropriate seeing as the rationale for mixed-use development as contained within the Cranbrook Development for Cranbrook is defective and it has no provisions for external finance or investment to ensure that a mixed-use allocation with commercial input would be successful

AQ7 Flooding of surface water and drainage infrastructure is required to ensure that it can be made to be effective.

Matter 5 Treasbeare Expansion Area

Issue 8 Is the Treasbeare Allocation (Policy CB3) Positively Prepared, Justified and Effective?

- Q57 There is no evidence that there is a provision that necessary infrastructure and service will be in accordance with the Housing trajectory.
- Q58 Item (c) There is no evidence that any consideration has been given to the impact of the flight path and testing facility in respect of noise.
- Q59 There is no justification for development on land identified as a green wedge within strategy 8 of the adopted local planning.
- Q62 There is no justification for inclusion of land within Rockbeare Parish in the Treasbeare allocation; Refer to Rockbeare Parish Neighbourhood Plan
- Q65 In view of individual impact on the green wedge and on the proposed (SANG) the sighting of a 5 pitch Gypsy and travellers site at the eastern extent of Treasbeare is not appropriate.
- Q69 Space allocated as (SANG) should be brought forward in accordance with the needs of the specific development and under no circumstances should it be violated.
- Q70 Please refer to Rockbeare Neighbourhood Plan.
- Q71 There appears to be no firm joint proposals with developers as to commencement and completion of the local centre. The delivery issues are still at large.
- Q72 The allocation of 950 dwellings is a maximum figure based on the developer's capacity to build and not on any actual requirements based on feasibility. There is not a demand for a larger allocation of housing.
- Q73 The 950 dwellings is to be incorporated within the Cranbrook plan as a whole. Hence a CDS scheme is required.

Matter 6 Cobdens Expansion Area

Issue 9 Is the Cobdens Allocation (Policy CB4) Positively Prepared, Justified and Effective?

Q74 (a) The acquisition of land is as legal procurement carried out by East Devon District Council (to be confirmed).

(b) There is no concise supporting evidence within the East Devon Local Development Scheme, the Cranbrook Common (Ginkgo June 2016), the Cranbrook Plan 2017-2031 and the sustainability appraisal of the Cranbrook master plan October 2017 that adequate preparation has been made within the development feasibility that there has been appropriate access for vehicles and pedestrians.

(c) There is no concise supporting evidence within the East Devon Local Development Scheme, the Cranbrook Common (Ginkgo June 2016), the Cranbrook Plan 2017-2031 and the sustainability appraisal of the Cranbrook master plan October 2017 that adequate preparation has been made within the development feasibility that there has been appropriate access for infrastructure and services including environmental constraints.

Q75 (a) There is no concise supporting evidence within the East Devon Local Development Scheme, the Cranbrook Common (Ginkgo June 2016), the Cranbrook Plan 2017-2031 and the sustainability appraisal of the Cranbrook master plan October 2017 that adequate preparation has been made within the development feasibility that there has been appropriate access for vehicles and pedestrians.

(b) There is no proper documentation in place evaluating the landscape impact which this development will cause.

(c) There is no further documentation in any of the feasibility reports produced which fully assess the input risk through redevelopment.

Q76 The figure of 1,495 dwellings has been based purely on the maximum capacity that a developer can build. It is not based on a detailed feasibility study of the actual housing requirements within the area.

Q77 There is a need for a comprehensive development scheme in relation to this allocation and the Cranbrook Plan as a whole. The Cranbrook Plan 2013-2031 dated February 2019, the economic development strategy for Cranbrook (undated) and the Cranbrook Town Council Business Plan are inadequate for preparation for a feasibility reference dwelling allocation whether for the Blue Hayes Scheme or for Cranbrook as a whole.

Q78 There could be a requirement for mixed-used areas within the development. What is proposed is not justified and it is not effective.

- Q79 It is not clear that the A5 use class premises, accord with national policy in paragraph 90 c of the framework. What is contained within CB4 of the Cranbrook Development Plan document is imprecise as to a range of business spaces or premises. There are no firm proposals at all with any substantiation of planning to support.
- Q80 The allocation of housing in the Cobden area and in the Cranbrook Plan as a whole is defective due to the restriction of a single line track for trains running into and out of the existing Cranbrook station to Exeter in one direction and Yeovil to the other. In addition the railway stock is inadequate and of a certain age with no provision for replacement. There is no provision within the National Transport Plan and British Rail to improve the railway system. Therefore if a second station was built at Cranbrook it would have nowhere to go. The existing facilities and station facilities need to be improved.
- Q81 There is no delivery mechanism in place for a second station.
- Q82 The creation of a new station would not affect the timings of services at Wimple station as the existing railway line and rolling stock is inadequate even for the provision that Wimpole station provides. None of this has been taken into consideration in the Cranbrook Plan.
- Q83 It is not known how the land allocated is to be protected.
- Q84 There is no assurance that development land to Cobdens Lane will encroach into Wimpole boundaries.
- Q85 The allocation of the site at Cobdens is in violation of the provisions including within the development items 1, 2 & 3. The land forms a settlement that goes back many hundreds of years and is predominantly agricultural. The development is in contradiction to the distinctive landscape and environmental qualities within where it is located.
- Q86 It is not clearly defined within the EDLP that is to remain separate to provide a green buffer space between the settlements. i.e. (SANG). There are no firm undertakings.
- Q87 There is no justification for development on the land identified as green wedge within Strategy 8 of the adopted local plan. The development is in breach.
- Q88 Consideration has not been given to the impact on archaeology and heritage assets.
- Q89 The only objective criteria on the recommendation to place only one of the overhead lines underground is cost.

- Q90 The placement of pylons underground is practical and should be recommended. Its only restriction is costing by the developers.
- Q91 It can be said that if the pylons are not placed underground it would blight the development of housing property in the Cobden area.
- Q93 No consideration has been given to the impact of the proposed development with reference to the closure of the southern end Cobdens Lane and the movement of farm vehicles. In addition, Cobdens Lane is used as an overflow to relieve traffic within Whimple village when traffic is heavy. In addition, as Whimple is subject to flooding, Cobden Lane is the only road with access into the village.
- Q94 The siting of junior sports pitch away from the main sports hub is not practical.
- Q95 There is no rationale for the siting of 10 pitches at the Cobden's Lane site to accommodate Gypsy and traveller community as there are no facilities or services in that area.
- Q96 The location of the provision is in breach of government guidance on the provision of sites.
- Q97 There is no consideration given by the Council in respect of the landscape impact.
- Q99 The spatial strategy with reference to the distribution of Gypsy and travellers pitches is ill-defined.
- Q102 There is no evidence to demonstrate that safer and appropriate access for vehicles and pedestrians can be provided. There is no transport within the Cobden area and the road system is inadequate.
- AQ9 Refer to a letter of objection proposed Gypsy and Traveller site at Cobden issued on 16 April 2019 to East Devon District Council.

Matter 7 The Grange Expansion Area

Issue 10 Is the Grange Allocation (Policy CB5) Positively Prepared, Justified and Effective?

Q106 (a) The acquisition of land is as legal procurement carried out by East Devon District Council (to be confirmed).

(b) There is no concise supporting evidence within the East Devon Local Development Scheme, the Cranbrook Common (Ginkgo June 2016), the Cranbrook Plan 2017-2031 and the sustainability appraisal of the Cranbrook master plan October 2017 that adequate preparation has been made within the development feasibility that there has been appropriate access for vehicles and pedestrians.

(c) There is no concise supporting evidence within the East Devon Local Development Scheme, the Cranbrook Common (Ginkgo June 2016), the Cranbrook Plan 2017-2031 and the sustainability appraisal of the Cranbrook master plan October 2017 that adequate preparation has been made within the development feasibility that there has been appropriate access for infrastructure and services including environmental constraints.

Q107 (a) There is no concise supporting evidence within the East Devon Local Development Scheme, the Cranbrook Common (Ginkgo June 2016), the Cranbrook Plan 2017-2031 and the sustainability appraisal of the Cranbrook master plan October 2017 that adequate preparation has been made within the development feasibility that there has been appropriate access for vehicles and pedestrians.

(b) There is no proper documentation in place evaluating the landscape impact which this development will cause.

(c) There is no further documentation in any of the feasibility reports produced which fully assess flood risk management due to redevelopment.

Q108 Refer to Rockbear Neighbourhood Plan.

Q110 Refer to East Devon District Council.

Q112 There appears to be no firm financial or feasibility report for the commercial development on the London Road.

Q115 The allocation of Percy Wakely Woods as part of the SANG is justified and effective.

Q116 The impact of development on the Grange parkland would be disastrous.

AQ10 The Grange Expansion Area should be modified reference Issue 9.

Matter 8 Phasing

Issue 11 Is the Phasing Programme Within (Policy CB7) Positively Prepared, Justified and Effective?

- Q118 There is no evidence within the official documents prepared and issued by East Devon District Council inclusive of the Sustainability Appraisal 2017 in the East Devon Local Development Scheme 2018 and the East Devon Local Plan 2013-2031 that any comprehensive feasibility has been prepared to achieve a coordinated appraisal to ensure measured release of sites over the planned period that confirm with the developer's contractual programme of works.
- Q119 It is not known whether multiple landowners have reached an agreement, this is subject to the legal procurement of East Devon District Council. There is nothing within documentation prepared which clarifies uncertainty for owners of smaller landholdings.
- Q120 Is to be improved by the developer's confirming on purchase of the land by preparing a detailed programme with reference to providing buildings.
- Q121 There is no evidence of the occupation restriction having been validated and there is no evidence that there are funds available to enable the delivery of the infrastructure which is due to Government restriction on finance. As stated there is no clarification with reference to the expansion area of CB2 to CB5 and a programme for the works accordingly.
- Q123 East Devon District Council have to legally confirm the position of SANGS which is to be put in place before any development of new housing is processed. There is no evidence in the documentation submitted on how this will be done.
- AQ11 Feasibility study is required to ensure that the phasing programme complies with Positively prepared, Justified, and Effective. There is no evidence within the document submitted by East Devon District Council that any of the questions Q118 to Q124 have been answered in a proper and comprehensive manner.

Matter 9 Infrastructure Delivery

Issue 12 Is the Infrastructure Delivery Envisaged by Policy (CB6) Justified and Realistic?

Q125 The infrastructure requirements on the development of this magnitude critical. There is no evidence within the documentation issued by East Devon District Council that the feasibilities prepared for road transport; rail transport and footprint are practical. There is no proper viability document.

Q126 The Cranbrook Infrastructure Delivery Plan attempts to be justified and effective but fails on both categories with reference to the infrastructure projects identified in the IDP. The projects are identified in the IDP are critical for the delivery of the Cranbrook Plan and it would be impossible for the project to be completed with any meaningful usage without it. There is grave doubt that the infrastructure proposed is deliverable due to the practical and financial restraints caused by Government financial policy.

Q127 The higher burden of infrastructure delivery has to be incorporated within the feasibility with reference to the development costs and the resale prices on properties other than Local Authority finance.

Q129 Allocation of costs and responsibilities referred to in Question 127.

Q130 Policy CB6 is not justified or effective. It will be impossible for the developers to provide the common infrastructure to make the transit development successful, not able to view the infrastructure delivery plan that is claimed as being produced for the district as a whole. Do not consider that the S106 legal agreements will be sufficient to provide the infrastructure and financial contributions required for a development of this size.

Q131 The allocation boundaries are insufficient as a stand-alone policy for a development of this size.

Q132 It is deemed that the developers will not provide finance for a town centre until additional homes have been built and sold. Even though there is still no guarantee that the developers will comply and provide a town centre. There are ongoing difficulties with the town centre for the existing development.

Q 133 The increased demand for school places will have an adverse effect on the existing Whimple primary school.

AQ12 The continuing reliance on developer finance to provide the infrastructure for the project is defective and not adequate for a development of this size. Additional outside finance and control will be required from East Devon District Council to provide the infrastructure required.

Matter 10 Specific Policies

Issue 13 Is the Policy Approach to the Built Up Area Boundaries Justified and Effective (Policy CB8)?

Q 134 The built-up area boundaries defined in the original plan not consistent with the assessment undertaken in the Sustainability Appraisal.

Q135 The policy approach to built up boundaries is not robust and consistent with the EDLP

AQ13 The boundaries of the Cranbrook Plan are required to be subject to feasibility to ensure that they comply with the areas defined in the Sustainability Appraisal.

Issue 14 Is the Public Enhancement Policy Justified and Effective (CB9)?

Q136 The policy for public transport is not justified or effective. It is impossible to provide Cranbrook with a half-hourly rail service whilst there is no provision for finance to provide (a) a double-track line and (b) new rolling stock and (c) a railway provider that is self-financing.

There is no delivery mechanism for the rail and bus infrastructure at present.

AQ14 The main modifications would be to (1) to provide double track from Exeter to Yeovil (2) To replace the rolling stock (3) to provide another railway franchise.

Issue 15 Are the London Road Commercial and Retail Proposals in Policy (CB24) Deliverable, Given the Alternative Retail Allocations in the Plan?

Q137 There is no justification for the allocation as a commercial zone given the proximity of the town centre allocation. At present, there is no town centre.

AQ15 A proper assessment is required with reference to any commercial zone with adequate finance.

Issue 16 Is the Proposal to Upgrade the London Road Through Policy (CB25) Appropriate and Deliverable?

- Q139 There is no feasibility within documents provided by East Devon District Council which provide a proportionate financial contribution to the cost of delivery of an attractive and pleasant environment. The existing line of development along London Road has taken away the delivery of an attractive and pleasant environment. It is impractical to recommend that a man route into Cranbrook via the London Road would take prominence over the London Road around the perimeter of Cranbrook. The London Road is the main thoroughfare between Exeter and the main A30 which runs into Honiton.
- Q140 The timing and delivery of upgrading the London Road if it was practical should run concurrently with the phased development.
- Q141 No proportionate financial contributions are defined to provide finance for the London Road.
- AQ16 The upgrading and finance of the London Road requires to be completely amended and resubmitted.

Matter 11 Affordable Housing

Issue 17 Is the (CB11) Consistent with the EDLP and with National Policy on Affordable Housing?

Q142 To reduce affordable provision to 15% is not justified. The Government policy is to provide increased affordable housing. It is obvious that the 15% provision is not adequate and this provision is developer lead not socially led.

Q143 The 15% affordable housing provision is not justified or effective.

Q144 The level of affordable housing provision has a critical inference on the finance of future infrastructure.

Matter 12 Employment Land

Issue 18 Is the Local Plan Positively Prepared, Justified and Effective in Respect of Employment Land Policies (CB2-CB5)?

Q148 The 18.4-hectare acres set out in the EDLP is needed to be defined.

Q149 The employment land will be secured through planning provision within the developer's contract programme.

Q150 The uptake on Phase 1 Cranbrook for residents has been abysmal with relation to employment.

Q151 There is no evidence whatsoever that the employment provision is adequate to sustain the settlement at Cranbrook. The main employers are only 3 in number of any size, close to Cranbrook.

AQ18 The employment provision for a development of this size needs to be completely reassessed in a practical manner so that it can sustain the inhabitants of Cranbrook.

Matter 13 Infrastructure Phasing

Issue 19 Are the Infrastructure Phasing Proposals Through Policy (CB7) Positively Prepared, Justified and Effective?

- Q152 The phasing of key infrastructure is not robust. It relies on developer finance and phasing.
- Q153 The infrastructure funding is crucial as it relies on the phasing of the 4 expansion areas, and not that the funding influences the phasing.
- Q154 The policy CB7 does not align with the Infrastructure Delivery Plan.
- Q155 The phasing strategy cannot be justified when the expansion area is controlled by a single developer.
- Q156 The delivery of the school is unrealistic.
- Q157 There is no rationale with the phasing of the school linking the 4 expansion areas.
- Q158 It is common sense that the primary school must be completed prior to the first occupation of any new dwellings.
- Q159 There is no mechanism for funding an additional station to serve the development and no funding investment in this area as the train provider is acutely short of funds.
- Q160 No feasibility to confirm that power, water and sewage capacity is in place.
- Q161 There is a problem if the power lines cannot be placed underground for the Cobdens allegation.
- Q162 The train loop at Cranbrook station is only a temporary measure to make the train line more efficient. The line will still be defective due to only having one line and the train provider and its rolling stock is defective.
- AQ19 The whole infrastructure of phasing requires to be rethought with additional finance to be provided other than from the developer to make the scheme practical.

Matter 14 Infrastructure Delivery

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

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

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

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

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

Matter 15 Viability

Issue 21 Are the Assumptions Made Regarding Land Values Fully Justified in Respect of the Viability / Infrastructure Delivery Plan?

- Q168 The upgrading of the London Road is critical before any developments should be envisaged.
- Q169 The section 106 allowance of £16,828 per plot is not substantiated.
- Q170 The actual breakdown of disaggregated assumed abnormal costs is required and it is unclear whether this has been featured in the costs per dwelling figure.
- Q171 There is no justification for deviation from the benchmark rate across the development (SANGS).
- Q172 There is an extremely high risk associated with the blended benchmarking rate regarding the delivery of infrastructure.
- Q173 The evidence to support the land value should be as market value. We have seen no assessment.
- Q175 No evidence that the GDV used by Three Dragons is as market value.
- Q176 Have not seen any sensitivity testing in respect of the figures used in the Housing trajectory.
- Q177 The assessment of valued residential development land lost to infrastructure is incorporated within the developers' feasibility project to ensure that Cranbrook is profitable. This has not been evaluated.
- Q178 There is no justification for the trajectory of housing delivery in comparison to the actual delivery of units since 2011. The delivery of units since 2011 has been wholly reliant on market values and has been reduced and non performing.
- AQ21 The assumptions included within Matter 15 should be finalised as a new feasibility to ensure correct values and figures are used to support the Cranbrook Plan.

Matter 16 Subject Specific Policies (1)

Issue 22 Is the Policy for Self Build Homes (CB12) Justified and Effective?

Q180 There is no justification for the allocation of 4% self-build homes in a projective new town of this size. This is impractical.

Q181 It is uneconomic to require developers to work with self-build groups rather than selling onto a third party.

Q182 The provision of alignment with a number of individuals on the Council's registrar is irrelevant. Those individuals would not be able to obtain finance for self-build.

AQ22 The policy for self-build homes in the Cranbrook Plan is unrealistic and should be omitted.

Issue 23 Is the Policy for Zero Carbon (CB13) Justified and Effective?

Q184 The zero-carbon allocation is an inadequate provision to comply with the national policy.

Q185 The supply of energy will be restricted by the requirement to connect to the local CHP as there is a need for it to be expanded due to the new development.

Q186 It will be impractical for the policy to relate to Zero Carbon Neutral at this time.

Q187 There is no reason why all dwellings cannot be within 400 metres of the basic facilities listed. The existing development at Cranbrook is extremely poor in providing any provisions of this nature.

Q190 The existing CHP facility relies on electricity.

AQ23 The policy for Zero Carbon on this development is restricted due to the local CHP provision which is not adequate for a development of this size.

Issue 24 Is the Policy for Safeguarding Land for Energy Uses, Justified (CB14)?

Q192 Not answered

Q193 Not answered

AQ24 Not answered

Issue 25 Is the Policy for Suitable Alternative Natural Green Space (SANGS) (CB15) Justified and Effective?

Q194 The (SANGS) funding for maintenance is essential.

Q195 Any paths within a (SANGS) should retain a natural character. The policy should be amended.

Q196 The length of all (SANGS) walks should be amended to 2.5 km in length to comply with the regulations identified in HRA.

Q198 It is crucial that the (SANGS) is in place prior to the first occupation of the dwellings as it is a legal requirement and part of the proposed plan.

Q202 It is essential that EDDC is permitted to the wider green infrastructure strategy prior to the implementation of the expansion areas.

AQ25 It is essential that the policy for (SANGS) is implemented before any development takes place.

Matter 17 Development Management Policies

Issue 26 Is the Approach to Design Codes (CB16) Justified and Effective?

Q203 It is essential that the design codes are implemented within a detailed master plan requirement before any development takes place.

Q204 The wording of the policy is inadequate to ensure planning for well-designed places.

Q205 The policy should make it fundamentally clear that the design codes are required from any detailed planning application stage in advance.

Q206 It is essential that the justification for the design codes must be in place before the Cranbrook plan is approved. The existing Cranbrook development is utterly devoid of these design codes.

Issue 27 Is the Approach to Amenity Policy (CB17) Justified and Effective?

Q208 It is essential that the nationally described space standards are included within this development.

Issue 28 Is the Approach to Digital Connectivity Policy (CB18) Justified?

Q210 It is essential that more than one provider is incorporated due to the poor digital connectivity evident within the existing phase.

Issue 29 Is the Approach to Co-ordinated Sustainable Travel within (CB19) Justified and Effective?

Q211 What is contained within CB19 is not justified or effective as the public transport system in the area is defective.

Issue 30 Is the Approach to Plug In and Ultra-Low Emission Vehicle Charging within Policy (CB20) Justified?

Q212 Not answered

Q213 The maintenance of plot facilities is as National policy.

Q214 Not answered

AQ30 Not answered

Issue 31 Is the Approach to Parking and Cycle Provision at Cranbrook within Policy (CB21) Justified?

Q215 Not answered

Q216 Not answered

AQ31 Not answered

Matter 18 Town Centre

Issue 32 Is the Cranbrook Town Centre Policy (CB22) Justified and Effective?

Q217 Not answered

Q218 There is no confirmation that the expansion areas will facilitate the delivery of the town centre. The developer's and EDDC are still in legal discussions regarding the delivery of the town centre.

Q219 Not answered

Q220 Not answered

Q221 There is no confidence that the town centre will be delivered which is a crucial factor with any development, especially for the development of some 5,000 dwellings.

Q222 The delivery mechanism for the town centre and market square is by development led finance and sale of houses.

Q223 Due to the nature of Cranbrook as a new town, there is no justification for residential use within the town centre.

Q224 There is no delivery mechanism in place for the neighbourhood centre reference the low take-up of premises in Phase 1. There is no demand.

Q225 Modular units are not applicable in the development of this size and should be omitted.

Q226 Town centre public space will be maintained by the Cranbrook Town Council. Reference should be made to the underfunding within the budget. Cranbrook Town Business Plan 2019-2024

Q227 Sustainability of the proposed market is not evident.

Q228 None of the new residents would be sustainable to achieve the objectives of the Cranbrook town without a town centre. It is inconceivable that a new town would be proposed without a town centre.

Q229 The Council does not have to finance to achieve the delivery of a town centre prior to any new phases of development.

Q230 Not answered

Q231 Not answered

Q232 Not answered

AQ32 The Cranbrook town centre policy requires revising in its entirety due to legal and financial restrictions.

Matter 19 Subject Specific Policies (2)

Issue 33 Other Policy Questions

Q233 Not answered

AQ33 Not answered

Issue 34 Heritage Considerations in Respect of Tillhouse Farm Redevelopment Policy (CB29).

Q234 Not answered

Q235 Adequate consideration must be given to secure the future of TillHouse Farm.

AQ34 Not answered

Issue 35 Does the Plan Deal Appropriately with Protected Species

Q236 There is no technical evidence of the protection of protected species including the skylark.

AQ35 Not answered