

**RESPONDENT – CRANBROOK LVA LLP – No. 145**

**MATTER 3 HOUSING STRATEGY**

**ISSUE 6: IS THE LOCAL PLAN POSITIVELY PREPARED, JUSTIFIED AND EFFECTIVE IN RESPECT OF HOUSING?**

***Q43 Through what mechanisms will the comprehensive development schemes referred to in CB2 to CB5 be delivered?***

The plan proposes that comprehensive development schemes (CDS), and also phasing strategies, are to be agreed for each of the expansion areas in their entirety prior to the determination of any applications for development within them. It is not exactly clear what mechanism would be used and how this is proposed to work in practice, particularly given the fact that the expansion areas are not all within one ownership/under the control of one party, and will therefore be subject to separate applications.

The need for a CDS to be agreed for an expansion area prior to the determination of any application for development within it is flawed and will only slow down/delay delivery. It is neither appropriate or necessary and therefore there is no need for the CDS; it would be an unnecessary layer of further bureaucracy. The Cranbrook Plan DPD and its accompanying masterplan provide a sufficient overarching guide for applications to be brought forward under and be determined based on the content of those applications.

***Q44 - How do the comprehensive development schemes required in each of the expansion area policies (CB2 to CB5) relate to the requirements for comprehensive phasing strategies (Policy CB7) and the masterplan (CB16)?***

The idea is that the CDS and the phasing strategies will be agreed together in advance of applications within an expansion area being determined, and these will be prepared to appropriately reflect the content of masterplan. As set out above though there is no need for CDS. For the same reasons, there is also no need for the comprehensive phasing strategies (CPS). The Cranbrook DPD should be making clear decision on these matters now to guide applications.

***Q45 - What is the status of the Masterplan in relation to Policies CB2 to CB5; CB16 and to the Plan in general?***

The Masterplan is there to guide the development of the expansion areas and it is part of the DPD (as a figure - #8) but not fixed and definitive like the Policies Map. The Masterplan Document is therefore not part of the DPD and would therefore not form part of the development plan; it would just be informal guidance (not even SPG status). This is a strange approach to adopt given the work and detail contained in the document. The Masterplan should really form a clear part of DPD (perhaps as an Appendix) so that it can be given appropriate weight in moving proposals forward.

***Q47 - Is there robust evidence to demonstrate that expansion areas and infrastructure would be delivered at a sufficient rate and suitable timescale to meet the Plan's housing targets given historic build out rates and the aspirations for 500 completions per year.***

No there is not. The level of further planning control proposed through the need for agreement of a CDS and CPS will delay the delivery of housing. Removing these requirements would allow sites to come forward easier. For example, the Farlands site is a site that can be delivered early in the plan period provided the levels of bureaucratic tape are removed.