

The Cranbrook Plan: Examination

Matter 3: Housing Strategy

Statement on Behalf of East Devon New Community
partners

Matter 3 – Housing Strategy

Issue 6: Is the Local Plan positively prepared, justified and effective in respect of housing?

Q37. Will the Plan provide for a choice and mix of housing to meet the needs of different groups in the community?

1. Yes.

Q38. Do the expansion area policies provide sufficient clarity and guidance for Plan users and are any main modifications necessary for soundness?

2. See detailed representations set out under each issue. More clarity and amendment is required.

Q39. Does the amount of housing proposed for Cranbrook accord with the EDDP taking into account the following: built homes, those with planning permission, previous allocations which have been subsumed into the new expansion areas and those now proposed in the plan which have not been previously allocated?

3. Yes.

Q40. Is the housing figure given in the EDDP still relevant and are the expansion areas as a whole (CB2 to CB5) consistent with the EDLP?

4. EDNCP believe that the housing provision in the EDLP is still relevant for a policy Framework that is specific to Cranbrook and does not seek to review the Local Plan. See detailed representations set out under each issue. More clarity and amendment is required.

Q41. What is the justification for additional greenfield sites at Cranbrook in preference to utilising the existing supply of brownfield sites within the district which could reasonably meet a proportion of the need?

5. Blue Hayes (CB2) and The Cobdens (CB4) are allocated sites and should be treated as being distinct from Treasbeare and The Grange which have no plan status at the present time. Bluehayes and Cobdens have been subjected to examination and found sound. CB3 and CB5 have not. The questions to be answered should reflect such distinctive starting positions.

Q42. Is the reference in Policy CB6 to residential development on nonallocated sites and the contribution they should make to infrastructure sufficiently clear to inform owners of the requirements?

6. See detailed representations set out under each issue. More clarity and amendment is required.

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

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)?

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7. The intention to prepare a Cranbrook DPD in addition to the East Devon Local Plan was set out in the Council's own modification to the Submission version of the East Devon Local Plan. The Local Plan was submitted for Examination in August 2013 and was finally adopted early in 2016.
 8. Applications for planning permission for the expansion of Cranbrook to the west, the south and east have been lodged with the District Council since December 2014. It is uncontroversial that east and west are allocated sites in an Adopted Plan. None of the applications have been able to be progressed pending progress on this Development Plan Document.
 9. The Local Plan Inspector was deeply sceptical of the need for and effect of the Council's intention to produce a DPD: *"In 2014 the Council decided to produce a Masterplan for Cranbrook to review progress and refresh its vision and design guidance. Insofar as it relates to securing delivery of housing, I am not persuaded that this exercise is necessary or that it is necessary to modify the Plan to refer to it"*. Local Plan Inspectors Report para 26.
 10. The Council ploughed on nevertheless.
 11. The Cranbrook DPD Issues and Options report was published in May 2016 - three years ago. The final phases of the extant Cranbrook planning permission for 3500 new homes are now being submitted for reserved matters approval. The restriction of the pipeline of development at Cranbrook caused by the absence of new consents for the expansion areas is about to become ever more acute.
 12. As such the proposed policies to require the additional approval of a comprehensive development scheme for the Cobdens expansion area is the very antithesis of a plan that is **positively prepared**. The intent appears to be to require a further level of LPA approval between the adoption of the DPD (itself of questionable necessity in the mind of the Local Plan Inspector) and before an outline planning application for the expansion areas can be considered. Further delay appears inevitable.
 13. Nor can the requirement for the approval of a comprehensive development scheme be in any way **justified** (even if it were clear what it was intended to be).
 14. If the purpose of the comprehensive development plan for Cobdens is to secure a comprehensive approach then this is unnecessary. The substantial majority of the development within the Cobdens expansion area is controlled by Persimmon Homes. It is necessary only, if anything is necessary at all, for a planning application to demonstrate how an application for all of the land controlled by Persimmon does not prejudice the delivery of any residual landownerships controlled within the Cobdens expansion area. This does not require a comprehensive development plan.
 15. Indeed, an updated application is in the course of preparation - having regard where possible to the submission DPD and the supporting evidence base. The application comprises some 90% of the allocated site and demonstrably has no impact on the ability of the remaining residual landownerships included in the Cobdens allocation to come forward for development. A comprehensive development scheme is completely unnecessary to that purpose or to the delivery of the DPD objectives.

16. If the purpose of the comprehensive development scheme is, as is mooted, to address matters such as biodiversity or green infrastructure or other master planning issues, then the proper means to do so is with the benefit of all of the technical assessments that form part of the process of producing an outline application - not prior to that work being undertaken.
17. For all the reasons set out above, the requirement for a comprehensive development scheme is **the antithesis of positive planning and is not justified** in any form. The following words should be deleted from the DPD as follows:

~~*“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.”*~~

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

18. Although included in in the DPD as Figure 8 The Cranbrook Masterplan document is simply described in its para 1.1 as forming part of the evidence base for the DPD. It is not at any point presented as the policy of the DPD. The position is made very clear in the Cranbrook Plan Sustainability Appraisal (Publication Draft (Feb 2019: Written by EDDC officers (para 1.1); para 6.1 refers to the appraisal of the 2019 Masterplan evidence: *“It is reiterated that the Masterplan is not part of the DPD, it is evidence that has informed the DPD...”*
19. To paraphrase the Masterplan shows how Cranbrook expansion could take place but does not say that that is how it will, or must.
20. Nor is there a need for a Master plan to be prepared for the expansion areas outside of the application process. Already there has been four years delay while the DPD has been prepared – the need for further documentation is onerous and ineffective.

Q46. What is the justification for the difference in numbers of pitches incorporated into the expansion areas to meet the needs of gypsy and traveller communities?

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.

Q48. How does the plan make specific provision for the housing needs of older and disabled people? How might the approach be adjusted to meet the identified needs for these groups?

AQ6. Are any Main Modifications proposed in relation to Issue 6?