

# **Statement for the examination of the Cranbrook DPD**

Response to the Inspectors Matters Issues and  
Questions

Matter 3: Housing Strategy

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

Response	Inspectors Question(s)
<p>1.1 <b>Will the Plan provide for a choice and mix of housing to meet the needs of different groups in the community?</b></p>	<p><b>Q37 – Choice and mix of housing</b></p>
<p>1.2 Within each of the expansion are policies CB2 – CB5 inclusive reference is given alongside the identified quantum for “typologies which reflect the location of development”. This approach seeks to recognise and encourage that housing choice should be wider than simply whether it comprises 2, 3 or 4 bedroom houses which is typical for much of the existing town. The policy aims to broaden the historical approach and encourage a diversity of housing types. Particularly in such location as the neighbourhood centres flats and apartments are expected while on the edge of the expanded town and where for instance landscape sensitivity is much greater it may be appropriate to have more loosely knit, lower density housing that allows a feathering of the development edge. Such areas can accommodate the delivery of bungalows.</p>	
<p>1.3 The language around typologies is one that is considered to be recognised within the development industry and while trying to avoid being too prescriptive the policy aims to facilitate the broadening out of the type of housing being delivered.</p>	
<p>1.4 In addition to the types of accommodation that can be delivered through the requirement for different typologies, further requirements within the Plan broaden the choice and mix of housing. Through Policies CB3 and</p>	

	<p>CB4 (Gypsy and Traveller allocation), CB11 (Cranbrook Affordable Housing); and CB12 (Custom and Self Build) the Plan seeks to meet the needs of a range of different groups and specific interests within the community.</p> <p>1.5 Taken together it is considered that this suite of policy requirements are sufficient to address the objectives of Paragraph 59 of the Framework and that the needs of different community groups within the town and with specific housing requirements are met.</p>	
<p>1.6</p> <p>1.7</p> <p>1.8</p>	<p><b>Do the expansion area policies provide sufficient clarity and guidance for Plan users and are any main modifications necessary for soundness?</b></p> <p>The Local Planning Authority consider that the expansion area policies CB2 – CB5 are clear and unambiguous setting out detailed expectations for the delivery of requirements within each area. The Policies recognise the need for particular infrastructure and uses and the expectations that the Council have concerning each of the four areas.</p> <p>One matter of concern that has been raised concerns the practicality and implementation of Comprehensive development strategies – this is a matter that is picked up in each of the Matters 4-7 for Policies CB2 – CB5 and will not be repeated here. However through these matters there is a suggestion for a Main modification to the respective policies.</p>	<p><b>Q38 – Clarity of expansion area policies</b></p>
<p>1.9</p>	<p><b>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</b></p>	

<p><b>subsumed into the new expansion areas and those now proposed in the plan which have not been previously allocated?</b></p> <p>1.10 In summary yes – a detailed breakdown which addresses this question has previously been submitted at the request of the Inspector and is recorded under document reference <a href="#">PSD4</a><sup>1</sup></p>	<p><b>Q39 – Conformity with housing requirement of the Local Plan</b></p>
<p>1.11 <b>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?</b></p> <p>1.12 Yes – Document <a href="#">PSD4</a> previously published on the Council’s website recognises that there is a need to identify land for and deliver a total of around 7850 houses whilst recognising that 3500 of those are already consented of which around 2000 are built and occupied. PSD4 gives a full explanation for the derivation of the housing that is required.</p>	<p><b>Q40 – Relevance of housing figures</b></p>
<p>1.13 <b>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?</b></p> <p>1.14 There are three main reasons for utilising greenfield sites at Cranbrook, rather than seeking to utilise brownfield sites elsewhere;</p> <p>1. To promote high quality appropriate development;</p>	<p><b>Q41 – justification for use of greenfield sites</b></p>

<sup>1</sup> <https://eastdevon.gov.uk/media/3482007/psd4-edc-response-to-psd3.pdf>

2. To ensure compliance with the policy of the adopted East Devon Local Plan; and

3. Because there are very few Brownfield sites in the District that are appropriately located to accommodate development.

1.15 The adopted East Devon Local Plan specifically provides for the future expansion of Cranbrook. Strategy 2 sets the scene by providing for around 7,770 dwellings. Strategy 12 then provides more detail by providing direct policy provision, including direct land allocations and a provision to make additional land allocations that will provide for Cranbrook growth. See also the response to Question 39.

1.16 The adopted East Devon Local Plan established a very clear spatial strategy for the scale and distribution of growth across East Devon. Debate around scale and distribution matters were therefore settled at the Local Plan stage of plan making and it would be inappropriate to re-open such in-principle concerns through the Cranbrook Plan.

1.17 The role of the Cranbrook Plan is concerned with setting out policy to support the implementation of the East Devon Local Plan. To not seek to plan for Cranbrook growth, in accordance with the Local Plan, would render the Cranbrook Plan unsound and therefore it is difficult to see how it could be adopted. The absence of a Cranbrook Plan would not, however, stop the development of the new town; rather it would mean that planning applications would need to be determined in the absence of the detailed policy coverage that the Cranbrook Plan provides.

1.18 Absence of the Cranbrook Plan could mean that whilst housing is built the social, community and wider facilities sought for the town might not

be secured and development might not come forward in appropriate locations.

- 1.19 Without re-running a Local Plan debate in answering this question it is relevant to note that Cranbrook is located close to other major strategic developments, specifically employment related uses and it is on the western side of East Devon and close to the city of Exeter. Of great significance is the employment provision and development that this side of the District benefits from, including at the airport, Science Park, Skypark and major distribution depots.
- 1.20 The location of Cranbrook, with policy set out in the Local Plan, seeks to co-locate new homes close to the substantial number of planned for jobs in this part of the District as well as being supported by new grey and green infrastructure provision associated with the overall package of development. Elsewhere in East Devon, east of Cranbrook, far more modest growth is appropriate reflecting, amongst other matters, the environmental constraints that exist in East Devon. Therefore there was and still is very sound planning logic for the planned growth of Cranbrook.
- 1.21 Notwithstanding the in-principle reasons why it would not be appropriate to meet Local Plan policy there are simply not the appropriate opportunities to accommodate the overall quantum of development planned for at Cranbrook on appropriately sited Brownfield land elsewhere in East Devon.
- 1.22 East Devon does not have a legacy of industrial or other intensive commercial activities. As such the District does not have the large number (or even small number) of tracts of unused or underused Brownfield land that some other planning authorities have available to
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work with. The few substantial areas of Brownfield land in East Devon that do exist tend to be located in the countryside areas that are remote from centres of population. For example there are two large airfields in East Devon dating back to the second world war, at Dunkeswell and Smeatharpe. Both offer large tracts of Brownfield land, but both are in remote rural areas, they are served by poor roads/country lanes. These airfields are not close to centres of population and they fall in the Blackdown Hills Area of Outstanding Natural Beauty. They are inappropriate for any form of large scale housing development.

1.23 **Is the reference in Policy CB6 to residential development on non-allocated sites and the contribution they should make to infrastructure sufficiently clear to inform owners of the requirements?**

1.24 Since submission of the Cranbrook DPD for examination, the revised CIL charging schedule for the District has been further consulted upon and has now been submitted for examination. This identified charging zones based on the Cranbrook Plan Area boundary as defined on the Cranbrook Plan Policies Map. Such direct linkage between the two is important.

1.25 However in recognising that these are inextricably linked, the revised (proposed) charging zones would mean that were development to come forward outside of the built up area boundary but inside the Cranbrook Plan Area (as a departure site) they would not be liable for developer contributions – either CIL or Section 106 contributions. As such it is suggested that a Main modification which addresses this concern is considered.

**Q42 – clarity of infrastructure requirements for non allocated development**

- 1.26 In exploring the clarity of the Policy, the current question (Q42) also addresses the final paragraph of Policy CB6 which references the need for non allocated development sites to make a “proportionate financial contribution”.
- 1.27 It was anticipated that this reference should match the per dwelling contribution that is identified within the IDP and as such allow additional contributions to be collected for items of infrastructure which are recognised as not being fully funded. It is considered entirely reasonable that development within the Cranbrook Plan areas makes fair and reasonable contributions to the infrastructure that it would benefit from and departure development should be no exception.
- 1.28 In reviewing the question that has been raised, it is recognised that the wording of the final paragraph of the Policy could be clearer – both to ensure that all relevant development that is brought forward makes a reasonable contribution, but also that developers of such land have certainty over their likely development costs. Suggested wording which could help inform a potential main modification is therefore set out within AQ 6.

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

1.30 The Comprehensive Development Scheme (CDS) is a mechanism whereby all minimum use and infrastructure requirements identified within the policy can be found a “home” (location), and delivered in full whilst recognising existing Green infrastructure and the options for enhancement. Such schemes will be secured as part of the Section 106 agreement.

**Q43 – Use of comprehensive development schemes**

<p>1.31 <b>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)?</b></p> <p>1.32 Comprehensive development schemes (CDS) identify where things go while the Comprehensive phasing strategy identifies in what order infrastructure will be brought forward.</p> <p>1.33 The Masterplan referenced in CB16 sets out the Councils preferred location/spatial distributions of infrastructure. It demonstrates how the key principles within the 12 values set out within the rest of Policy CB16 should be employed. However the policy also allows scope for a developer to put forward their own spatial distribution providing they evidence/explain how this has had regard to the Masterplan and the key principles it embodies. While the masterplan effectively provides a default layout for a number of the strategic infrastructure items listed within the allocations policies, it remains a higher level document that does not address every requirement. As such there remains a need for a CDS.</p> <p>1.34 Comprehensive Phasing strategies should address all infrastructure a uses identified within an allocation area (or CDS area as agreed if this is a smaller area). In order to recognise this change within Policy CB7 a medication is set out in response to AQ6 below</p>	<p><b>Q44 – Comprehensive development schemes and phasing strategies</b></p>

1.35	<b>What is the status of the Masterplan in relation to Policies CB2 to CB5; CB16 and to the Plan in general?</b>	<b>Q45 – Status of the masterplan</b>
1.36	<p>The Masterplan is an evidence document that helps to establish the quantum of housing for each expansion area and the potential location of housing and other infrastructure. In demonstrating the principles for good design and layout it should be used as a default plan unless agreement is achieved between different developers of a particular expansion area and/or a developer’s alternative distribution. In both scenarios, the alternative plans must respect the same key values, make provision for the same infrastructure and evidence the need for changes. Recognising this approach it is implicit within Policy CB16 that where it requires “regard” to have been given to the plan, changes will be considered where these are needed to address evolving issues such as revisions to the EA flood zones.</p>	
1.37	<b>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?</b>	<b>Q46 – Justification for gypsy and traveller pitch numbers</b>
1.38	<p>The equalities legislation and Government guidance recognise that the ‘Traveller’ definition encompasses a wide and varied range of people with differing needs, preferences and travelling patterns. For the purposes of this response, ‘Traveller’ is taken to mean anyone meeting the Government definition- in East Devon this is mainly Romany Gypsies, Irish Travellers and New Travellers.</p>	

- 1.39 [Consultation](#)<sup>2</sup> was undertaken with a variety of Travellers in December 2017 and January 2018 to determine their requirements and these have been incorporated into the Cranbrook Plan as far as possible.
- 1.40 The provision of two separate sites provides an opportunity for Travellers to choose the site which best meets their needs and reduces the potential for conflict (with the settled community and those who follow a different travelling lifestyle). The consultation concluded that at least two sites, ideally of 6-10 pitches each, should be provided, and the Cranbrook Plan has endeavoured to achieve this.
- 1.41 The Treasbeare site provides an opportunity for an extended family group, or several families sharing a cultural identity, to live in close proximity. This was expressed as a strong preference by Romany Gypsies in the consultation.
- 1.42 Restricting the site size to 5 pitches will encourage integration with the surrounding settled community and enable pitches to adapt to the topography and accommodate landscaping so that the site is less obtrusive when viewed from the wider area.
- 1.43 The Cobdens site is larger, more level and on the edge of Cranbrook and is considered to be capable of accommodating more pitches without detriment to occupiers or the wider community. This site can meet the needs of a variety of Travellers- it is sufficiently large to provide animal grazing and vegetable growing space and there is room to separate different groups of Travellers to meet their different needs and lifestyles.

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<sup>2</sup> <https://eastdevon.gov.uk/planning-libraries/cranbrook-plan-pa-2017-18/eddcsummarygypsyandtravellerresponses.pdf>

<p>1.44 <b>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.</b></p> <p>1.45 The housing trajectory set out within viability testing evidence (<a href="#">Cran063</a><sup>3</sup>) recognises that no single expansion area is expected to bring forward more than 175 houses in any one year and more commonly a target of up to 150 is expected. Noting that there are different house builders constructing in each of the expansion areas, that they will typically target different markets and have a different offer for customers, it is reasonable to expect developers in all four areas to be operating at the same time.</p> <p>1.46 In addition and with the exception of Treasbeare, there are likely to be more than one outlet operating within a single expansion area and this too has the ability to widen the market and in increase supply. The totals per house builder are therefore considered to be within what can be considered a realistic output from each developer in any given year.</p>	<p><b>Q47 – Delivery rates of housing</b></p>
<p>1.47 <b>How does the plan make specific provision for the housing needs for older and disabled people? How might the approach be adjusted to meet the identified needs for these groups?</b></p> <p>1.48 The plan doesn’t specifically address housing need for older people although recognises the need for a range of types of accommodation which should include the provision of development more suitable for</p>	<p><b>Q48 – Housing needs for older and disabled people</b></p>

<sup>3</sup> <https://eastdevon.gov.uk/media/2760827/east-devon-cil-review-and-cranbrook-viability-report.pdf>

<p>older people. Such development could also include the delivery of bungalows that are considered particularly appropriate in the more landscape sensitive areas.</p> <p>1.49 Existing Local Plan Policy already identified a need to deliver accessible homes and this is maintained in the Cranbrook Plan.</p>	
<p>1.50 <b>Are any Main Modifications proposed in relation to Issue 6?</b></p> <p>1.51 1. Policy CB6 (last paragraph) amended to read:</p> <p>Residential development proposals on non-allocated sites within the Cranbrook <b>Plan Area</b> <del>Built-up Area Boundary</del> must make a <b>the</b> proportionate <b>(per dwelling)</b> financial contribution <b>set out within the up to date Cranbrook Infrastructure Delivery Plan towards identified infrastructure which is to outstanding either</b> unfunded or not fully funded infrastructure.</p> <p>2. Policy CB7 (first paragraph) amended to read:</p> <p>...an approved comprehensive phasing strategy for each expansion area or area as agreed through a <b>Comprehensive Development Scheme.</b></p>	<p><b>AQ6 – Main modifications</b></p>

# Appendices

**There are no appendices with this statement**