

# CRANBROOK LOCAL PLAN EXAMINATION

## REPRESENTATIONS

### **MATTER 3**

## HOUSING STRATEGY

PREPARED ON BEHALF OF WADDETON PARK LTD

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#### HOUSING STRATEGY

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

##### 1.1 Question 47

***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.***

1.1.1 As far as we are aware, there is no robust evidence to demonstrate that expansion areas and infrastructure would be delivered at a sufficient rate and a suitable timescale to meet the Plan's housing targets.

1.1.2 The timely delivery of Natura 2000 habitat mitigation measures is a pre-requisite to the occupation of new homes. In order to be confident about housing delivery one also needs to be confident about Habitat Mitigation delivery.

1.1.3 The SANGS delivery strategy embodied in the EDLP (and this plan does not propose to amend that approach) is strategic, and the EDLP Inspector placed confidence in that approach, with Strategy 10 being strengthened accordingly (see IR, paragraph 25, [Appendix 2 to Matter 1]).

1.1.4 Monitoring of this approach was considered important (see IR, paragraph 25 [Appendix 2 to Matter 1] and Strategy 47 [Appendix 1 to Matter 1]). However, monitoring and review has not taken place.

1.1.5 We have therefore raised significant concerns regarding the delivery (or lack thereof) of SANGS which, in these particular circumstances, are a pre-requisite to housing delivery.

1.1.6 We have also raised concerns that, as far as we have been able to ascertain, there has been no robust review/assessment of the land proposed to be safeguarded for SANGS by Cran001. In our opinion, any such review would need to include a qualitative assessment (i.e. an assessment of compliance against SANGS criteria) and an assessment of deliverability (i.e. funding, ownership etc) in order to establish if the sites proposed as

SANGS are capable of functioning as SANGS and of being delivered in a timely manner. In absence of such a review it is not therefore possible to conclude that the SANGS delivery strategy proposed in the Cranbrook Plan (Cran001) would be effective.

1.1.7 In our view therefore, together with the changes proposed to how SANGS are to be funded (i.e. via S106 as opposed to CIL), there cannot be any certainty regarding the delivery of SANGS. As the delivery of SANGS in these circumstances is a pre-requisite to the delivery of housing, there can in turn be no certainty that Cran001 will be effective in meeting the District's housing targets.

1.1.8 The plan has not therefore been positively prepared or properly justified and is unlikely to be effective having regard to Paragraph 35 of the Framework. See Matter 1, Issue 1, Questions 4 and 8 for detailed comments in this regard.