

RESPONDENT – CRANBROOK LVA LLP – No. 145

MATTER 6 COBDEN'S EXPANSION AREA

ISSUE 9: IS THE COBDEN'S ALLOCATION (POLICY CB4) POSITIVELY PREPARED, JUSTIFIED AND EFFECTIVE IN RESPECT OF HOUSING?

Housing numbers

Q74 - Is the proposed housing allocation deliverable and/or developable in accordance with the housing trajectory? In particular, is it:

a) confirmed by the landowner involved as being available for the use proposed?

b) supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?

c) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?

The Cranbrook LVA LLP Farlands site is available and can be delivered early and promptly to contribute to the deliverable housing supply as envisaged in the housing trajectory. As shown in the outline planning application (ref: 14/2945/MOUT), the site has a safe and appropriate access. Also, the site can contribute towards the delivery of the necessary infrastructure, which would be secured in a section 106 agreement. This is agreed in principle with East Devon District Council.

However, there are uncertainties related to the current draft of the DPD that need addressing to ensure that the housing allocation is deliverable and developable. This is particularly the case given the ambitious delivery figures set out in the housing trajectory. As mentioned elsewhere in our submission, the need for the agreement of comprehensive development scheme (CDS) and comprehensive phasing strategy (CPS), and the infrastructure delivery requirements, have the potential to delay delivery.

Q75 - Has full consideration been given to the impact of this allocation on:

a) Access arrangements

b) Landscape impact

c) Flood risk and drainage?

The necessary level of assessment and consideration has been given to these matters for this stage of the planning process, particularly in respect of the Farlands site. The remaining detailed consideration of these matters is and can be dealt with at the planning application stage.

Q77 - What is the purpose of a Comprehensive Development Scheme in relation to this allocation?

The purpose is to add a further level of masterplanning for this growth area however this is inappropriate and unnecessary. The DPD and the associated masterplan provide sufficient guidance for applications to be brought forward. The rest can be considered and determined through the planning application process (including through the imposition of appropriate planning conditions).

It is not necessary or appropriate for a further level of planning control to be in place so the policy requirement for CDS can and should be removed.

Mixed Use

Q78 - Is the allocation of mixed-use areas justified and effective?

The allocation of mixed use areas is necessary to allow for the creation of a neighbourhood centre within the Cobdens expansion area. However, the area defined on the policies map for the Cobdens expansion area is not justified and effective. This is because it is not the most suitable given the reasonable alternatives that are available. It makes more sense for this area to be located further east along London Road so that it is all within one ownership.

Also, we question whether the size of the area shown on the policy map is too large. It is important that this neighbourhood centre is not of a size that will adversely impact on the vitality and viability of the town centre.

New station

Q80 - Would the allocation of housing in Cobden's be justified if a second station were not to be delivered?

Yes it definitely would. There is an overriding need for the housing to be delivered and the station does not have any bearing on that justification. The station is to be provided to help service the expansion of the town to the east, however, it is not a necessary component; more a "nice to have". There are alternative solutions to encourage the use of alternative modes of transport and enable residents from the Cobden's expansion area to easily access the existing train station (e.g. via dedicated pedestrian and cycle routes and a shuttle bus).

Pylons

Q90. Is the undergrounding of pylons practical and viable for developers?

No it is not. The available information is not clear on the cost and costs are likely to be higher than the Council has indicated to date. The work done is also based on a one application area assumption, which would not be the case. The cost of doing the undergrounding of the electricity supply has a substantial effect on viability (as set out in the Richard Sturt & Co response submitted on behalf of Cranbrook LVA LLP) and should therefore be removed.

Q91. In the event that pylons are not undergrounded how would this affect the robustness of this land as a housing allocation?

It does not. It is not uncommon for housing developments to be built around/accommodate pylons through layout design (as shown on the illustrative masterplan prepared for the farlands development/application [14/2945/MOUT]). The housing allocation can still therefore be delivered without the pylons being removed and the supply put underground. The undergrounding of the supply is just a "nice to have".

Q92. How is the proposal to underground the overhead lines consistent with the Plans overall objectives 1- 3 (pg. 3)?

It is not. The objectives of the plan can still be achieved without the requirement for the removal of the pylons.

Sports pitches

Q94. Would the siting of a Junior Sports Pitch (JSP) away from the main sports hub be justified and effective?

No it would not. As stated in our representations to the Submission draft of the DPD a JSP at the location indicated will likely have adverse impacts in terms of access and parking, and noise impacts on the amenity of future occupiers. As residents will be travelling to and utilising the sports hub to be provided within the Treasbeare expansion area it makes sense for the additional JSP to be located as part of that concentrated provision.

Other queries

Q103. Has full consideration been given to the impact of the development on archaeology?

An appropriate level of consideration has been given for this plan-making stage in the process. The appropriate information has been provided for my client's Farlands site as part of the live application (14/2945/MOUT) and further information will be obtained as other parts of the expansion area are brought forward in due course.

Q105. Is the siting of the SEN education facility justified and effective?

Yes it is. The SEN is sited at an appropriate point within the Cobdens expansion area, adjacent to the proposed 630 pupil primary school, where it will be able to serve the local area effectively. It is also all within one ownership meaning that its delivery can be easily secured (whilst appropriate contributions are made from the other developments across the expansion areas). If it was to be located anywhere else, the next best location would be to the south of London Road, next to the neighbourhood centre, within the Grange expansion area.

Additional question

AQ9. Are any Main Modifications proposed in relation to Issue 9?

- Remove requirement for comprehensive development scheme
- Revise area shown for mixed use neighbourhood centre on policies map
- Need for removal of pylons to be removed from policy
- Remove requirement for JSP from the policy