

# THE CRANBROOK PLAN

Examination  
Matter 9: Infrastructure Delivery

Persimmon Homes South West

January 2020

JBB8750  
The Cranbrook Plan

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## Matter 9 – Infrastructure Delivery

### Issue 12 - Is the Infrastructure Delivery envisaged by Policy CB6 justified and realistic?

This Matter Statement is provided on behalf of Persimmon Homes South West (PHSW) who has a controlling land interest at the Cobdens Expansion Area.

#### 1.1 **Q125. What is the Councils rationale for infrastructure delivery in the manner set out in the plan; which elements are negotiable, and which are fixed? What is the cumulative impact of the infrastructure requirements on viability?**

1.1.1 Paragraph 1.7 of Cran030 sets out that the Infrastructure Delivery Plan was prepared at a particular point in time and that costs will vary in time. PHSW contend that it is essential that this is recognised during the decision making process for the applications that will come forwards in the future for the expansion areas. The IDP should be maintained and updated on a regular basis. Notably this should include recognition that the prioritisation of various identified items of infrastructure may vary over time. Policy CB6 should be updated to reflect this requirement.

1.1.2 PHSW also consider it essential that those with an interest in the delivery of Cranbrook are appropriately engaged in the process of updating the IDP.

1.1.3 PHSW consider that in principle all infrastructure should be negotiable, but that clearly some infrastructure is more important than others to the success of Cranbrook. PHSW consider the critical, important and desirable categorisation in Cran030 to be a sensible starting point in clarifying the priority to be given to the various infrastructure requirements. However, PHSW also note that negotiation means that a site or parcel does not provide the full infrastructure provision envisaged by the Plan it will be important to ensure that equalization continues to apply. Furthermore it will also be important to ensure that the principle of negotiation is fairly applied to ensure that sites that come forwards later on are not unduly overburdened by the under delivery of infrastructure by earlier sites, should that issue arise.

1.1.4 Cran30 provides the infrastructure category 1-3 (pages 13/14) list of identified shared infrastructure, which as indicated relate to the detailed categories and costings in Appendix 1. PH observe that whilst the undergrounding of the pylons is clearly identified in Appendix 1 it is not listed in category 2 summary on page 13 of Cran30 and should be modified accordingly.

#### 1.2 **Q126. Is the Cranbrook Infrastructure Delivery Plan justified and effective? To what extent are the 'strategic' infrastructure projects identified in the IDP necessary for the delivery of the Plan? Is the infrastructure proposed deliverable?**

1.2.1 PHSW generally consider the infrastructure items proposed for Cobdens within Cran030 to be justified, effective and deliverable subject to the proposed method of equalising costs described at paragraph 2.29 and illustrated by the table in appendix 1 of the same. PHSW note however

that this is subject to the costs apportioned to the infrastructure to being accurate and justified. Paragraph 3.3 of Cran030 acknowledges that there are a number of items of lower priority infrastructure that are not fully costed and that due to, at least, the full costs of these components not being fairly or reasonably related to the scale of the total expansion. For these items to come forwards Cran030 sensibly notes that third party/external funding will be required.

- 1.2.2 PHSW consider it important to note that not all infrastructure is critical. As set out in Cran030 some infrastructure is critical, some is important, and some is desirable. It is important to ensure that the delivery of much needed homes is not delayed because desirable infrastructure has not yet been provided. This is particularly the case with category 3 infrastructure where contributions from various parties may be required to be collected before the individual items of infrastructure can be provided.
- 1.2.3 However, as set out in the response to Policy CB4 PHSW consider the costs identified for the undergrounding of the pylons identified in Cran031 and apportioned to Cobdens under item 2 in appendix 2 of Cran030 to be too low. PHSW have assessed the costs for the undergrounding of the 132kV line for Cobdens as indicated in its Matter 6 Statement and estimate that the costs associated are £7.56m.

**1.3 Q127. The IDP recognises that Treasbare and Cobden’s have higher burdens re infrastructure delivery. How will this policy ensure that these costs are balanced to equate the burden between the remaining expansion areas?**

- 1.3.1 PHSW consider the approach set out in the policy which requires equalisation to be the only justifiable approach based on the infrastructure requirements set out in table 2 of Cran030.
- 1.3.2 PHSW contend that the proposed approach whereby sites such as Cobdens which are accommodating a disproportionate volume of category 2 infrastructure make a reduced contribution to category 3 infrastructure and the converse to apply for sites such as the Grange to be the only approach that ensures the Plan to be viable.

**1.4 Q128. How might infrastructure provision/requirements be better balanced between Cobden’s and the Grange?**

- 1.4.1 As indicated above provided the costs are appropriately equalised and the pylon costs being appropriately identified then the infrastructure provision/requirements on both sites can be effectively delivered.

**1.5 Q129. How will a fair allocation of costs/responsibilities be achieved?**

- 1.5.1 PHSW consider the equalisation process described in paragraph 2.29 of Cran030 to be the appropriate general approach to ensuring that costs and responsibilities are allocated fairly. However, PHSW do have concerns regarding the details of how this will be achieved. In particular PHSW consider that it will be necessary to ensure that issues such as holding costs and liabilities are fully accounted for otherwise some landowners/developers may be unduly burdened.
- 1.5.2 PHSW propose that given the essential nature of the equalisation process to the delivery of the Plan that CB6 should be expanded to make clear that S106 legal agreements will be utilised to

ensure equalisation of costs. Importantly the Council will effectively act as banker in this process and this should be explicitly referenced and explained in the policy and supporting text. This process is fundamental to the delivery of the Plan and should therefore form part of the policy.

**1.6 Q131. What is the purpose of the Built-Up Area Boundaries (BUAB) reference in Policy CB6? Why would the allocation boundaries in CB2 to CB5 and the stand-alone policy CB8 be insufficient?**

1.6.1 PHSW consider the Built-Up Area Boundaries (BUAB) and the associated policy CB8 to be unjustified and unnecessary at this time. Please see response to Matter 10 Q134 and 135. The allocations and references to the various items of infrastructure in this policy are sufficient to secure the delivery of infrastructure. Constraints of the sites will also ensure that development is not disproportionate and will define to a degree land use budget.

**1.7 Q132. How will the Council ensure that the town centre uses are delivered in a manner which would be able to sustain additional homes. What would be the implications of additional phases progressing in the absence of the town centre facilities?**

1.7.1 PHSW understand that positive discussions are taking place with potential occupiers regards to the delivery of additional town centre uses. While these discussions are commercially sensitive and as such confidential PHSW are confident that town centre facilities will be in place at the appropriate time to support the delivery of future phases.

**1.8 Q131. How will the increased demand for school places arising from the development be accommodated prior to the completion of the new school? How will this impact on surrounding schools (particularly Whimble Primary School)?**

1.8.1 This is ultimately a matter for the Council to address, particularly in light of available evidence of school capacity and anticipated build out rates from the expansion areas.

1.8.2 PHSW consider as addressed in its Matter 6 Statement that justification does not exist for a new school to be provided in its entirety at Cobdens at 30 completions and similarly the policy should enable a phased approach to the delivery of the school buildings to be provided as delivery from housing on the expansion areas comes forward.

**1.9 Additional Question AQ12: Are any Main Modifications proposed in relation to Issue 12?**

1.9.1 Revise policy CB6 to:

- include a clear explanation of how the equalization process will work in practice; and
- remove reference to the Built-Up Area Boundaries.

1.9.2 Add examples of how the equalization process will work in practice in the reasoned justification.