

# THE CRANBROOK PLAN

Examination  
Matter 10: Specific Policies

January 2020

JBB8750  
The Cranbrook Plan

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## Matter 10 – Specific Policies

### Issue 13 Is the policy approach to the Built-up Area Boundaries justified and effective? (Policy CB8)

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 Q134. Are the Built-up Area Boundaries defined in the plan consistent with the assessment undertaken in the Sustainability Appraisal?

1.1.1 No. As noted on page 119 of Cran057, the Sustainability Appraisal, the Built-up Area Boundaries (BUABs) were only introduced at the publication stage. As such they were not subject to the earlier assessment undertaken in the previous stages of the Sustainability Appraisal.

1.1.2 The assessment undertaken by the Sustainability Appraisal on the suitability of sites was based on land holdings, whereas the BUABs appear to have been drawn based upon Cran052, the Cranbrook Masterplan. As the BUABs differ from the landholdings that were assessed by the Sustainability Appraisal they have not been assessed consistently. Indeed, paragraph 9.66 of Cran057 notes:

*“It is highlighted that specific sites or land area options that could fall in an extended boundary have not been identified. Assessment and commentary is therefore provided on a generic level only.”*

1.1.3 PHSW note the difficulty in undertaking a Sustainability Appraisal on detailed site-specific options for new developments such as the expansion of Cranbrook at this stage in the plan making process. It is precisely for this reason that detailed BUABs should not be defined by the Plan.

#### 1.2 Q135. Is the policy approach to BUABs robust and consistent with the EDLP and national policy?

1.2.1 Strategy 6 of the EDLP states that BUABs are defined on the Proposals Map around the settlements of East Devon. Cranbrook did not exist as a new settlement at that time. The EDLP West End Inset Map defines the boundary for the Cobdens expansion area zone. This is broader than the area shown on the Masterplan accompanying the Plan. PHSW do not consider that the introduction of a further BUAB within this allocation or the plan is justified at this stage.

1.2.2 The existing allocation boundary was prepared on the basis of evidence produced at the time of the preparation of the EDLP, while further work has been done to produce Cran052 PHSW contend that it shows one potential spatial expression for the development of Cranbrook, not the only option and does/should not define individual filed boundaries/precise extents to development, upon which a detailed BUAB should be based. Cran052 has rightly been informed by the evidence available at the time of its preparation, however this does not mean that BUABs should be defined by it. PHSW consider that to do so would prevent the consideration of the

more detailed understanding of opportunities and constraints that will come about as planning applications are prepared for Cranbrook. In particular suitable mitigation may be identified to address constraints to development as detailed proposals are developed. Accordingly, PHSW do not consider the policy approach to BUABs to be robust or justified.

1.2.3 PHSW however do note that to be consistent with Strategy 6 and 7 of the EDLP it may be appropriate to introduce BUABs at a later date when development has occurred. PHSW contend that the appropriate time to consider this will be when the Cranbrook Plan is reviewed.

1.2.4 With regards to national policy the overall approach enshrined in the NPPF is for increasing the supply of new homes. Paragraph 11a) requires that plans should be sufficiently flexible to respond to changing circumstances. PHSW submit that the introduction of BUABs at this stage would not support either of these aims and that as such the proposal to do so is not consistent with national policy.

### **1.3 Additional Question AQ13. Are any Main Modifications proposed in relation to Issue 13?**

1.3.1 For the reasons set out above PHSW propose that policy CB8 is deleted in its entirety. PHSW also propose that the BUABs are deleted from the policies map for the Cranbrook Plan.

## **Issue 14: Is the public transport enhancement policy justified and effective (CB9)?**

### **1.4 What is the delivery mechanism for rail and bus infrastructure improvements outlined in this policy?**

1.4.1 The policy fails to identify who is responsible for the delivery of these improvements and whether they have been identified let alone costed. There has been little evidence to substantiate this policy. More evidence base work needs to be undertaken by DCC in association with Network Rail and train and bus operating companies as well as with developers and landowners.

### **1.5 Additional Question AQ14: Are any Main Modifications proposed in relation to Issue 14?**

1.5.1 Not at this time, although PHSW anticipate that there will be as a result of the further evidence base work.

## **Issue 16: Is the proposal to upgrade the London Road through Policy CB25 appropriate and deliverable?**

**1.6 Q139. Is the priority given to the upgrading of London Road appropriate and would it be deliverable given the competing demands on the use of funding generated from the development?**

1.6.1 PHSW note that the prioritisation of the use of funding is set out in Cran030 and that paragraph 3.4 of that document states that Cran030 must be kept under review and remain as a live document. PHSW contend that this is essential given the concerns raised by others with regards to competing demands on the use of funding generated by the development.

**1.7 Q141. How will proportionate financial contributions be defined?**

1.7.1 PHSW consider the only manner in which proportionate financial contributions can be defined is to be consistent with the equalization process being applied to other infrastructure as set out paragraph 2.29 of Cran030 and illustrated in appendix 1 of the same. Our response to Matter 9 expands on this point.

**1.8 Additional Question AQ16: Are any Main Modifications proposed in relation to Issue 16?**

1.8.1 See Matter 9 AQ12.