

**RESPONDENT – CRANBROOK LVA LLP – No. 145**

**MATTER 17 DEVELOPMENT MANAGEMENT POLICIES**

**ISSUE 27: IS THE APPROACH TO AMENITY POLICY CB17 JUSTIFIED AND EFFECTIVE?**

***Q208. Is the inclusion of Nationally Described Space Standards (NDSS) justified and consistent with national policy?***

We object to a blanket requirement across Cranbrook to meet the Nationally Described Space Standards (NDSS) because of the impact this will have on viability. This blanket application is not justified by the evidence presented by the LPA or in accordance with footnote 46 of the NPPF or NPPF ref 56-020-20150327 which requires justification of space standards and account of matters including need and viability.

**Additional Question:**

***AQ27. Are any Main Modifications proposed in relation to Issue 27?***

This policy should be deleted from the plan.

## **MATTER 17 DEVELOPMENT MANAGEMENT POLICIES**

### **ISSUE 30: IS THE APPROACH TO PLUG IN AND ULTRA-LOW EMISSION VEHICLE CHARGING WITHIN POLICY CB20 JUSTIFIED?**

***Q212. To what extent has this policy been designed to be futureproofed and how has the impact on viability and maintenance of off plot facilities been considered?***

***And***

***Q214. How might the viability be affected by the requirement for such provision***

It appears that this policy is breaking new ground and the impact on viability has not been fully explored and understood. The policy requirement is therefore unjustified and should be removed. Whilst we acknowledge the aspirations behind such a policy, there will have to be a degree of flexibility in the requirement to deliver such infrastructure due to future technological changes/advances which may make such provision obsolete.

#### **Additional Question:**

***AQ30. Are any Main Modifications proposed in relation to Issue 30?***

This policy should be deleted.

## **MATTER 17 DEVELOPMENT MANAGEMENT POLICIES**

### **ISSUE 31: IS THE APPROACH TO PARKING AND CYCLE PROVISION AT CRANBROOK WITHIN POLICY CB21 JUSTIFIED?**

#### ***Q215. Is Policy CB21 consistent with national policy in respect of cycle parking requirements?***

No – whilst cycle parking is obviously a very positive component which should be facilitated in new development, the suggested rate of delivery of one space per bedroom goes beyond national policy requirements and design guidance.

#### ***Q216. Is Policy CB21 justified and effective with respect to car parking provision? Should such provision include integral garage spaces?***

Parking provision should allow for more flexibility and integral garage spaces should not be discounted, particularly where they are based on a dimension sufficient to accommodate a car (3300x6000mm).

#### **Additional Question:**

#### ***AQ31. Are any Main Modifications proposed in relation to Issue 31?***

Yes – remove the requirement to provide 1 bicycle storage space per bedroom.