

THE CRANBROOK PLAN

Examination
Matter 17: Development Management Policies

January 2020

JBB8750
The Cranbrook Plan

Jan 2020

Matter 17 – Development Management Policies

Issue 26: Is the approach to Design Codes (CB16) justified and effective?

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 Q203. How will the design codes secure a measure of flexibility to allow for changing conditions? To what extent is it intended that the design codes implement the detailed masterplan requirements at Fig 8 and how does the existing wording provide for this?

- 1.1.1 PHSW consider the principle in policy CB16 for proposals to “have regard to the layout of development indicated in the Master plan shown at Figure 8...” to be suitably flexible. This is not requiring proposals to be in accordance with the Master plan, or some other alternative form of wording that would require strict application of the Master plan which would be overly prescriptive and unjustified.
- 1.1.2 PHSW do note however that the wording of the policy could be clearer in making this point.

1.2 Q204. Does the wording of this policy remain robust in the light of the recently published Planning Policy Guidance section on planning for well-designed places?

- 1.2.1 PHSW note that it does not reflect the 10 characteristics set out in the National Design Guide as per ID 26-001 of the PPG

1.3 Q205. Should the policy make clear whether the design codes are required at outline or detailed planning application stage or in advance of either?

- 1.3.1 PHSW are concerned that policy CB16 as currently drafted could be interpreted as requiring the design codes to be approved in advance of planning applications, although note that the current wording is unclear on this point. PHSW consider that a requirement for a design code to be agreed in advance of planning applications, be they outline or detailed, would be an unnecessary introduction of a further stage to the development process. This would only serve to introduce yet further delay to the delivery of much needed new homes and infrastructure. Should a design code be required this should be undertaken as part of the standard planning process and prepared and submitted as part of a planning application. PHSW consider that it is most appropriate to do this at the outline or full planning application stage, rather than at reserved matters.

1.4 Q206. What is the justification for the reference to the Masterplan in policy CB16?

1.4.1 PHSW note that ID26-006 and ID26-007 of the PPG provides guidance on what masterplans are and how they can be used effectively which should inform the role and status of the masterplan. PHSW also note that paragraph 1.22 of Cran057 sets out that the masterplan shows how development could take place that would be consistent with the policies of the Cranbrook Plan. As such PHSW consider that the masterplan is a suitable starting point for considering the layout of new development at Cranbrook, but that alternative layouts may also be capable of being consistent with the policies of the Cranbrook Plan. Accordingly, PHSW consider that there should be a degree of flexibility as planning applications come forwards and that it should be acknowledged that alternative layouts are also capable of being acceptable.

1.5 AQ26. Are any Main Modifications proposed in relation to Issue 26?

1.5.1 Revision of policy CB16 to:

- clarify what having regard to the masterplan entails and that alternative layouts will be acceptable if they are consistent with the policies of the Plan;
- update of design principles to reflect the National Design Guide; and
- clarify that design codes will be approved alongside outline or full planning applications.

Issue 27: Is the approach to Amenity Policy CB17 justified and effective?

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

1.6.1 PHSW consider that the proposed inclusion of NDSS has not been justified and there is not consistent with national policy. Notably, no assessment of the need (i.e. the essential demand for NDSS) has been undertaken. The impact upon affordability has also not been assessed. ID56-020 of the PPG requires that Local Authorities provide justification for requiring NDSS and that they should take account of need, viability (including the impact on affordability) and timing.

1.6.2 Policy CB17 as drafted requires NDSS across all of the expansion areas, yet this has not been justified.

1.7 Q209. How might the delivery rates be affected by the introduction of NDSS?

1.7.1 PHSW anticipate that delivery rates would be negatively impacted by the introduction of NDSS. The introduction of NDSS would impact on the final sales price of new homes potentially pricing out potential buyers. This would reduce the pool of individuals able to afford a home and so

reduce the sales rate. As delivery rates are inherently linked to sales rates this is likely to reduce the delivery of new homes.

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

1.8.1 Removal of policy CB17.

Issue 31: Is the approach to Parking and Cycle provision at Cranbrook within Policy CB21 justified?

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

1.9.1 PHSW do not consider the requirement for 30% unallocated parking to be justified. Purchasers of housing want, if at all possible, on plot parking and this should be allowable as the priority (wherever possible). The requirement for 30% unallocated parking bays adjacent to adoptable streets increases the potential for conflict and can emphasise the prominence of vehicles within the street scene. This would be contradictory to point 10 of policy CB16.

1.9.2 PHSW consider that the requirement for each garage to be built to a larger size means that integral garage spaces should be counted within the parking space allocation. While it is acknowledged that garage spaces are not always utilised for parking and are sometimes converted to alternative use. If there are concerns about this, they can be addressed through an article 3 direction removing the permitted development right to convert garages, allowing control of such changes through the planning process.

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

1.10.1 Revision of policy CB17 to:

- Remove requirement for 30% unallocated parking; and
- Include garage spaces within the overall quantum of car parking spaces.