

Responses to additional questions raised by the Government Inspector regarding the Cranbrook Local Plan

Reference AQ22/3/4 - Gypsy and travellers sites at Treasbeare and Cobden's

From the point of view of democracy and localism, Whimble Parish Council in January 2018, has clearly stated that it objects to the Gypsy site being proposed on the Cobden Lane 'triangle' with the subsequent impact on our so called 'Green Wedge' between us and Cranbrook. Whimble already has a permanent Traveller Site within our Parish Boundary and less than 2 miles from this proposed site along with a further temporary site at Daisymount.

It has been made clear that land to the east of Cobden Lane would remain open countryside, in accordance with the agreement made between Cranbrook Town Council, Whimble Parish Council and the awareness of East Devon District Council. This relates to the ceding of a number of hectares of land from Whimble to Cranbrook. I take the view that this point is fundamental to our nation characterises of decency, honesty and fair play, between partners.

It therefore seems wrong to build a traveller site in or alongside an area which will be too remote and far from many facilities that the travellers will need to access in Cranbrook.

Considering the expanding area of Cranbrook surely this site should be located further within the Cranbrook boundary. It is more logical for a larger site further towards Exeter in Cranbrook and cannot see why it is necessary to have two sites. It must be more cost effective, and have improved viability to family groups of the Traveller Communities.

The next issue is the appropriateness for accommodation of Gypsy and Traveller Site. Here one could argue that the site is not appropriate as there are major local concerns and significant opposition. The Summary of representations received, in representative number order, linked to 'Public consultation ran from 11 March – 24 April 2019', at plan Publication stage, received a total of 431 representation, the majority from Whimble Parish, of which 234 had issues / objections to the siting with the parish.

With reference to East Devon District Council Local Plan 2013 – 2033 (Adopted – 28 January 2016) H7 - Sites for Gypsies and Travellers

"In the period up to 2034, 37 gypsy and traveller pitches and 3 plots for travelling show people should be provided. During the first 5 years, from 2014-2019, at least 22 of the gypsy and traveller pitch should be provided and 1 of the travelling show people's plots".

As I understood the issues to be raised was the viability of sites throughout the District Area, not just focusing purely on Cranbrook. This was made clear in my report in my Report: Cranbrook Report 'Developing our future Protecting our inheritance', Chapter 6. Non-permanent Housing. Dated 10th November 2019.

“East Devon District Council should therefore demonstrate that it has undertaken full, robust and proactive investigations of the options including detailed site assessments. Before allocating new Gypsy and Traveller sites within the Cranbrook Area as a whole. The council should have provided evidence that they have robustly sought to identify all alternative options for the intensification and expansion of existing sites and through the provision of local authority and RSL (Commercial residential site company) owned and managed sites first”.

There is a peculiar bias by East Devon District Council towards pushing the Gypsy and traveller community in Cranbrook, when in actual fact two thirds will be in Whimble.

There was one other key point for trying to ‘Sell’ Cranbrook was it has main road linkages. It has the B3174, however the main road from Exeter to Lyme Regis A3052 may have more appropriate options for sites with excellent road connect ability. In addition the A373 from Honiton to Cullompton and the A35 from Honiton to Axminster.

Extract from East Devon District Local Plan – Approved 28th January 2016

The following settlements vary in size and character but all offer a range of accessible services and facilities to meet many of the everyday needs of local residents and they have reasonable public transport. They will have a Built-up Area Boundary that will be designated in the East Devon Villages DPD though they will not have land specifically allocated for development.

- Beer
- Broadclyst
- Clyst St Mary
- Colyton
- East Budleigh
- Feniton
- Kilmington
- Lypstone
- Musbury
- Newton Poppleford
- Sidbury
- Uplyme
- West Hill
- Whimble
- Woodbury

The Neighbourhood Plan for Whimble is currently in progress to formalise the desire for no development east of Cobden’s Lane, which includes housing and site for Gypsy and Travellers.

Gypsy and Traveller Provision

East Devon has relatively few permanent sites for Gypsies and Travellers and unauthorised sites are occasionally reported but this tends to be a short-term seasonal problem. A Devon Partnership Gypsy and Travellers Accommodation Assessment 2014, by RRR Consultancy Ltd, was completed in early 2015. This study has identified a need in East Devon, in the period up to 2034, for a total of 37 Gypsy and Traveller pitches and 3 plots for travelling show people. During the first 5 years, from 2014-2019, at least 22 of the Gypsy and Traveller pitches should be provided and 1 of the travelling show people plots (there is a travelling show person site at Clyst St Mary that has sufficient capacity to accommodate identified need). The study also identified a need for 4-5 short-term stopping places (each consisting of 4-5 pitches) up to 2019, but did not specify where these should be located. Additional pitches and plots will be provided through appropriate intensification/expansion of existing sites, the provision of a local authority/RSL owned/managed site or sites and through land allocations in a Gypsy and Traveller Development Plan Document, production of which will commence in June 2015 to be submitted for examination by the end of 2016. In addition Whimble has its own sites for Gypsy and Travellers, within its Parish boundaries. These individual sites in small numbers aids integration and provides a stable base to reside.

Inspectors Assessment

The Assessment identifies a need for 37 new gypsy and traveller pitches in East Devon up to 2034 and 3 for travelling show people. This includes a need for 22 pitches to be provided between 2014 and 2019. The targets in Policy H7 will, in part, be delivered by a Gypsy and Traveller Development Plan Document (DPD). The Council has started to produce this plan and promised that it would be ready for examination by the end of 2016 (and agreed to a modification requiring this). Assuming that the Gypsy and Traveller DPD is found sound and adopted in 2017 this leaves little time to provide 22 new pitches by 2019. There is nothing in the modified policy to require all 30 pitches to be in the same place.

Modification Schedule

Bluehayes 10. 5 serviced permanent pitches for gypsies and travellers on an area of at least 0.5 hectares.

Cobden 10. 10 serviced permanent pitches for gypsies and travellers on an area of land of at least 1 hectare

Critically, a power line will cross the proposed site, with the risks that it entails to public healthy

Serviced Gypsies site £1,432,500 Inc. contingency plus fees Cost from cost consultant. A surprisingly high cost piece of infrastructure, but consultants do very well out of it.

Letter from Inspector to EDDC

“As discussed at the examination, parties will be afforded the opportunity to comment on the rationale for the exclusion of alternative sites and on the revisions to the SA”. The Council has not provided evidence that indicates sites across the entire District have been investigated. I am also not aware of written evidence from the Gypsy and Traveller community as to their views.

Reference AQ12 – Plot contribution, section 106

According to the Guardian (26th Feb 2019) *“Housebuilder Persimmon made a record-breaking £1bn profit last year – equal to more than £66,000 on every one of the homes it sold – with almost half of its house sales made through the taxpayer-funded help-to-buy scheme. The profit from each house it sells has nearly tripled since 2013, when the government introduced the help-to-buy scheme in an attempt to help struggling families buy their first home”.*

This provides evidence that perhaps they are not providing a sufficient plot contribution

Reference AQ16 – General questions

Promoting the Commercial Prosperity and Vibrancy of our Town Centres

Section 16.16 East Devon Local Plan (EDLP) indicates that the main East Devon towns are commercially vibrant centres offering employment, community activity, transport links and shops. The town centres serve not just their immediate residents, but also support the surrounding rural hinterland and in some cases they form a major destination in their own right, notably Honiton in respect of antiques. The new market town of Cranbrook will also develop into this service centre role. Retail policy throughout the plan has been informed by a retail study produced for the Council by GVA Grimley in 2008 and updated in 2011.

Without a Town Centre Cranbrook is not a viable sustainable community, it is a suburb. Ebenezer Howard (Letchworth & Welwyn Garden City) would not be amused. One super store, is not the answer.

Design Standards

Achieving High Quality and Locally Distinctive Design

Section 21.1 in the EDLP, promoting high quality and locally distinctive design is of critical importance. We will seek to ensure the highest design standards to reflect local traditions

and use of local materials. The varied geology of East Devon has helped to ensure we have a diverse range of traditions and style in development and we see it as essential that traditional vernacular is retained.

It is regrettable that what has happened on the ground **bears no resemblance to the virtuous ambitions of the Local Plan**. To my knowledge there is only one building in Cranbrook that has vernacular styling and that's the Pub - Cranberry Farm. The Town expands with 'any town' houses – the Council has failed in its duty to the built environment and its own Plan.

Rail Transport

Latest information from Network Rail indicates that their priority is to develop a loop between Whimble and Cranbrook. However, the creation of Cranbrook East Station has been put on hold. This is regrettable as providing excellent communication to, Honiton, Axminster and Exeter is vital for a sustainable transport policy. It would take 10 minutes from East Cranbrook to Exeter City Centre, by bus more than thrice as long. AS further expansion of East Exeter occurs, road transport is going to get worse.

SANGS

It is difficult to understand the calculations for land allocated for SANGS without knowing how the calculations are arrived at. Eight Hectares per 1000 population is meaningless, unless you know the model for persons per household. There this is providing misleading information to the inspectorate.

Final Statement

I have no more to add to the information and Reports I have written regarding Cranbrook.

- a) Cranbrook Master Plan Consultation 2017
- b) Building for the future - Cranbrook Master Plan - Appraisal and Critic – April 2019.
- c) Cranbrook Report - Developing our future, Protecting our inheritance - November 2019
- d) A report on the Cranbrook Local Plan 2019 (A supplementary submission regarding; matters, issues and questions identified by the planning inspector for examination).

I trust that the above information has been taken into account and the interests and desires of the people of Whimble are a major factor in the decision making process.

Now it's over to you!

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