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September 2020 - Further Representations relating to the latest information re Cranbrook Plans

I have three main points to make, mostly relating to the additional question AQ22 raised by the Inspector following the previous hearings in February 2020, to be considered in connection with the re-convened hearings currently scheduled for November 2020.

1. At the first round of hearings in February 2020, it was stated by East Devon District Council (EDDC) that they were going to obtain further information relating to having asked the Gypsy and Traveller (G&T) community where they would want the potential required new sites to be provided (which is one reason why the hearings back in February were adjourned). However, in the latest information published online in July 2020, EDDC appear to make out that the G&T community had been asked about their preferences in January 2020 regarding where they would potentially like sites for them to be set up. If this is the case, i.e. just weeks before the earlier hearings, why was this not mentioned when the February hearings took place? Why, at the February hearings, did EDDC fail to mention something that was both recent and pertinent? Further, may we be informed in greater detail what were the responses of those members of the G&T community who were consulted (possibly as a Freedom of Information request)?

2. The contents of Document 2 appear to me to be seriously flawed, and far from what one would describe as 'sound' or 'robust'. The scoring methods used in the detailed assessment within Document 2, and the actual scores given on the various attributes used to determine the suitability or otherwise of the various sites listed as potential locations of G&T sites, appear to me to be flawed, and many of the scores ascribed do not make any logical sense. It appears to me that the scores have been fabricated so as to make it seem as if the site at Cobdens (site 'K' on the map at page 38 of Document 2) is the best potential site, and the assessments seem to have been rigged deliberately so as to back up the earlier (and seemingly rather random) suggestion from EDDC that site 'K' is the most suitable location.

In particular, for example, this site is totally unsuitable as a G&T site because, noting EDDC's assertion that "Good pedestrian access to facilities is especially important for the G&T community" (as stated under item 'h' on page 36 of Document 2), most of the facilities that members of the G&T community would require access to are quite remote from the site in question. Specifically, schools should be within 30 minutes' walking distance of any G&T site, which clearly would not be the case here as things stand, and in any case it would be unsafe for schoolchildren to walk along the London Road (B3174) which is a busy main road with no pavements and no street lighting. By comparison, the suggested site at Treasbeare (which is site 'T') is much closer to the existing schools and the planned (and now long overdue!) town centre, allowing much easier and safer access to facilities such as shops and doctors. [By the way, why is the town centre still not being built? One can't blame Covid - house construction has continued, so why have the retail premises and other facilities still not started to appear?]

Also, the issue of noise plays against the Cobdens site (site 'K'), as that site is close to the busy B3174, and the construction materials used in G&T-type dwellings would allow more noise to come in through the walls than would be the case with 'bricks and mortar' dwellings. Positive scores have also been given for site 'K' to such matters as 'Community services', 'Education and skills', 'Health', and 'Sustainable transport', whereas all the facilities required for these are remote from this site i.e. shops, schools, doctors, nearest bus stop or railway station. Furthermore, development of any kind at or near to site 'K' compromises the Green Wedge which surely needs to be maintained between Cranbrook and Whimble. Development at Site 'T', on the other hand, would not compromise any green wedge or threaten settlement coalescence.

Regarding the issue of noise, it seems strange that site 'K' has been scored positively for this aspect, whereas other possible candidate G&T sites which also are close to the B3174 London Road have been scored negatively for this aspect - hence my previous assertion that the scoring appears to have been fabricated and is itself totally unsound. Also, on the noise issue, consideration should also be afforded to sites closer to the railway line, as the noise impact from the current service level of just one train in each direction per hour is surely a lot less than the almost continual noise of traffic along London Road.

Has any assessment been made on how much impact there would be for the residents of the existing long-standing properties of Little Cobden Farm and Bodley Bridge Cottage from having travellers and gypsies nearby, with heavy vehicles regularly coming in/out of London Road, often for business purposes? It is noted on page 51 of Document 2 that site 'K' "benefits ... in not having any immediate neighbouring residential properties", although the very existence of the two properties named in my last sentence goes against this assertion. Further, it appears that in their assessment EDDC have chosen to minimise the impact of possible development on the historic listed property at Little Cobden. And siting the G&T site away from other residential dwellings - notwithstanding Little Cobden Farm and Bodley Bridge Cottage - is cited as one good reason to use site 'K', yet at the same time is it not planned for part of that site to also contain residential dwellings once it becomes built out? Another clear contradiction.

While site 'T' is clearly much more suitable than site 'K', there are other sites as shown on the map at page 38 of Document 2 that are better located, such as site 'A2' which is close to existing shops, schools, and railway station, while far enough away from the B3174 to allay any noise issues, and also on the fringes of the Cranbrook conurbation which has also been suggested as being ideal. However, EDDC appear to have conveniently dismissed Site 'A2' in Table 10.1 (Sustainability Appraisal of alternative site development options) in Document 2, suggesting it should be kept as SANGS, and ignoring the fact that there is already a large swathe of SANGS land (including the country park) extending eastwards from near the railway station. Site 'P' could also have been given stronger consideration, as it is close to London Road and also close to most amenities.

3. It is unclear why EDDC consider the maximum reasonable number of pitches on any one individual G&T site to be only ten. This seems to be a rather arbitrary limit, not chosen on any material grounds. If this were to be increased to say 15, as was suggested earlier in the SPD, then all the G&T pitches to be allocated to Cranbrook could be on just one site, achieving economies of scale during the construction phase. It is clear to me that all the 15 pitches could and should therefore be built at Treasbeare (site 'T'). Or if the limit has to be reduced to ten pitches on any one site, the question arises as to why more of East Devon's apparent requirement for G&T pitches cannot be met at sites in parts of the district other than Cranbrook, i.e. build ten pitches at Treasbeare and nothing at Cobdens. Other sites across East Devon could then surely be expanded, and in any case it's clear that the use of brownfield sites should be explored before greenfield sites are used, to avoid the use of what in many cases is currently good-quality agricultural land.