

## Independent Examination of Cranbrook Plan

### Provision of Sites for Gypsy and Traveller Accommodation

#### **Representations on behalf of WHIMPLE PARISH COUNCIL**

Before specifically responding to the questions raised regarding the Traveller and Gypsy site proposals we wish to reiterate Whimble Parish Council's strong view that the scheme for the expansion of Cranbrook must protect Whimble and the surrounding villages to ensure there is no coalescence of settlements. The green wedge should be expanded westwards together with the Clyst Valley Regional Park. Previous promises and assurances made by EDDC to WPC should be honoured with no development crossing Cobden Lane. There should be no redirection/closure of any part of Cobden Lane and no vehicular access off Cobden Lane into the Cobdens expansion site.

#### Proposed site at Cobdens

1 The proposed gypsy and traveller site forms part of Site K. Document 2 (at p. 51) notes "that a negative landscape impact is identified in respect of this site on account of (sic) its location on the easterly edge of Cranbrook ... A further concern in respect of this site is that it is comparatively remote from areas proposed for development, for example 2,400 metres from the town centre..." Therefore, the provision of a site in this location would clearly run counter to the requirements of the gypsy and traveller community, as expressed in paras. h and i of the key considerations and be unsuitable to their requirements and needs

2 In the "Commentary on suitability to accommodate gypsies and travellers", it is noted that "The site also benefits, for gypsy and traveller accommodation, in not having any immediate neighbouring residential properties".

Only last week Whimble Parish Councillors were invited to a presentation from Persimmon homes who presented their latest draft plans for the Cobdens expansion and said these were to go to public consultation 'next week' having been discussed with EDDC planners. Both parties appear to be demonstrating a lack of respect to this hearing which is yet to conclude and appear to be carrying on regardless. In the draft plan shown to the Parish Councillors Persimmon are planning to build houses immediately next to the proposed Traveller site. We therefore question the claim as along with the new draft plan seen from Persimmon and in Fig. 1.4: Masterplan shows a proposal for bricks and mortar housing immediately to the west of the site. Strangely, there is no adverse comment regarding the noise impact arising from the site's proximity to London Road – counter-intuitively, it has a positive score in the relevant chart - although in the case of other sites within the Cranbrook development, e.g. Sites B1, G and Q, proximity to London Road is put forward as a reason for considering such sites to be unsuitable for this use.

3 The provisions of para. 6.93 in Document 1 and the key considerations noted in para. 2.4 of this paper appear to have been disregarded. The site is remote from the main health and other community facilities offered by the town centre. Para. 6.93 acknowledges in principle that "Effects on many of the SA objectives will be more positive where pitches are well-connected ...", but in respect of a site in this location, those effects would be wholly negative. There is no footpath or street lighting along London Road. It is entirely unreasonable, therefore, to expect anyone who might live on the proposed Cobdens site to visit the town centre on foot, nor would any patient walk to the GP surgery there. The prospects for jobs, those sites identified for employment use being some 1.5 km further to the west of the town centre, are as remote as the employment sites themselves; no employee would walk such a distance to work. If they were to find employment in Exeter, they would not walk to the railway station, either to the existing one – that is also some 1.5

km to the west of the town centre - or to the potential second one, if that were ever to be provided. Until the proposed new primary school is built, children living on the site would have to travel some 3 km to the existing St Martin's School.

4. Any comparison with the proposed site at Treasbeare is stark: that site has much to offer by way of proximity to services and facilities, whereas the site at Cobdens is at the opposite end of any scale of what is locally available to the gypsy and traveller community. In any event, in addition to the site at Treasbeare, there are other site options which have not been adequately assessed.

5. Other locations - A proper and full analysis of the relevant selection criteria is required, which despite the additional time allocated to the hearing evidence suggests this has not taken place. The provision of sites must reflect the needs of the Traveller and Gypsy Community. It is clear that by selecting a second site which is as remote from the town centre as possible the needs and wishes of the Traveller and Gypsy Community have been largely disregarded. The location must be much closer to the services and facilities which are provided. The site at Treasbeare meets the requirements set out in the Cranbrook Plan for gypsy and traveller use particularly well, and consideration should be given to accommodate on this site the 15 pitches identified as being required. If it is concluded that this would be an over-development of the site, it should be extended to accommodate an increased number of pitches, with EDDC being charged with the task of identifying another site - not that at Cobdens, which is too remote from town centre services and facilities - to accommodate the remaining number required. We note that ten of the areas within Cranbrook have an SA Objective score which is better than the score given to Cobdens and that of that number, seven have been rejected on the grounds of land value and/or land ownership, grounds which in planning terms we consider to be invalid.

6. Neither the cost of land acquisition nor the size of land ownership is a valid planning consideration. We understand why the partners which make up EDNCp might approve - their motivation is driven by the bottom line and a wish to reduce the cost of the public realm - but we believe that EDDC has fundamentally misdirected itself. If the owner of a parcel of land suitable for gypsy and traveller site use is so minded, he/she may apply for planning permission, (the equivalent of a Section 17 Certificate of Appropriate Alternative Development, if EDDC had been the acquiring authority), which would require the local planning authority to specify what the use of the site might otherwise be. This would determine what value should be attached to the land in question.

We understand Persimmon Homes have previously objected to the planned location of a Traveller and Gypsy site in the Cobdens expansion and we have no doubt that they would prefer to build more houses on the land in question rather than leave the land as a green open space, avoiding the coalescence of settlements and retain the Cobden Lane boundary.

#### Conclusion

The provision of sites should be made following a proper analysis of the relevant selection criteria taking fully into account the needs and requirements of the gypsy and traveller community to identify the most suitable location and not on the basis of the inconvenient cost of land or the vagaries of land ownership. Expansion of Cranbrook must protect Whimble and the surrounding villages to ensure there is no coalescence of settlements.

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