

**Independent examination of
the Cranbrook Local Plan –
Stage 2 Questions**

**Response to Questions AQ14-
AQ15 (Implications for housing
delivery)**

Prepared For
Cranbrook LVA

Respondent number 145

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1 IMPLICATIONS FOR HOUSING DELIVERY

AQ14. THE REVISED PAPERS ADJUST THE HOUSING TRAJECTORY FOR CRANBROOK TO BEYOND THE 2031 DATE SPECIFIED IN THE PLAN. WHAT ARE THE IMPLICATIONS OF THIS EXTENDED PERIOD FOR THE CRANBROOK PLAN BEARING IN MIND THE REQUIREMENT TO REVIEW THE PLAN IN ACCORDANCE WITH (REGULATION 10A OF THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012) EVERY FIVE YEARS?

- 1.1 The East Devon Local Plan was adopted 28 January 2016. Therefore in accordance with Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 a local plan review should have been completed by 27 January 2021. At the current time, East Devon District Council have not started to review their current local plan.
- 1.2 We also note that Inspector's Report on the examination into the New East Devon Local Plan concluded at paragraph 53 that the Council should be prepared to conduct an early review if new homes are not delivered at the required rate and/or the strategy for distributing new housing is failing to meet the need for market housing and affordable housing outside the West End.
- 1.3 Strategy 2 (Scale and Distribution of Residential Development) of the local plan confirms across the Local Plan period up to 2031, Cranbrook will deliver 4370 houses through their Strategic Allocations. The Cranbrook Plan (which states approximately 4170 houses will be delivered) covers the period up to 2031. The viability report which forms part of the original evidence base (Cran063) was also based on a housing trajectory up to 2031.
- 1.4 However the updated viability report (PSD21a) now refers to the housing trajectory highlighted above. This extends the delivery of Cranbrook up to 2033 and outside of the both the Cranbrook Plan and the Local Plan period. Furthermore the viability report obviously relies on monies collected from development outside of the plan period. We would ask the Inspector to note whether this is the correct approach as it seems the infrastructure identified and considered in the viability report can only be secured with the council buying themselves more time to deliver the housing required.



1.5 Clearly if the Local Authority are saying that they are unable to deliver the housing originally intended within the plan period, this highlights the need for a local plan review to ensure infrastructure and delivery of the local plan can be achieved across the timescales required and also suggests a revised approach to infrastructure delivery will be needed at Cranbrook.

Table 3.11 Cranbrook housing trajectory

Area	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	Total
Bluehayes					20	65	150	179	150	159	150	87			960
Treasbeare				30	105	105	105	105	105	105	105	105	45		915
Cobdens				40	100	120	185	192	192	168	130	130	130	108	1495
Grange				20	67	85	97	115	115	115	72	55	55	4	800
Expansion Area Total	0	0	0	90	292	375	537	591	562	547	457	377	230	112	4170
Net of self-build				75	277	360	522	576	547	532	442	362	215	96	4000
Amended for cashflow				75	277	360	522	561	561	532	442	362	215	96	4000

3.6.7 The housing delivery trajectory is used to inform the programme of costs over the development. Further detail can be found in the DAT model. Costs are phased in one of the following ways:

- Phased in advance of dwelling sales costs (8 months before first sale)
- Phased with sales start and end dates
- SANGs phasing
- Other costs - individually phased

3.6.8 Table 3.10 indicates which approach is taken for each cost, and how the total is apportioned across the different phases. Note that phases run concurrently.

Figure 1 - Cranbrook Housing Trajectory from Cranbrook Viability Study

AQ15. WHAT IS THE DELIVERY PLAN/TIMESCALE FOR THE EXTRA CARE PROVISION TO WHICH THE £3.5 MILLION CONTRIBUTION RELATES AND WHERE IN THE HOUSING TRAJECTORY FIGURES IS THIS PROVISION ACCOUNTED FOR? [COUNCIL]

1.6 There appears to be no delivery plan/timescale for the extra care provision within the housing trajectory figures. This further undermines the need for this financial contribution to be delivered and we suggest this item should be removed from the IDP.