

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

**Response to Questions AQ13
(Forward Funding)**

Prepared For
Cranbrook LVA

7348
September 2020



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CHARTERED TOWN PLANNERS

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1 FORWARD FUNDING

AQ13. THE COUNCIL SAY THAT NO ALLOCATION IS MADE IN THE IDP FOR GAS CONNECTION DUE TO THE USE OF THE ADDITIONAL CHP PLANT TO SERVE THE WIDER DEVELOPMENT. THIS WAS THE SUBJECT OF SOME DEBATE AT EARLIER HEARINGS. CAN THE COUNCIL GIVE AN UPDATE ON THE EXPECTED TIMING OF THE FACILITY AND AT WHAT POINT IN THE UPDATED TRAJECTORY IT WILL BE EFFECTIVE IN SERVING NEW UNITS GIVEN THAT AT THEIR EARLIEST UNITS COME ON STREAM IN 2022/23. IS THERE SUFFICIENT CAPACITY IN THE EXISTING FACILITY TO SERVE PLOTS IN THE MEANTIME?

- 1.1 Whilst noting that this question is aimed at the Council, following the debate that took place during the hearing sessions, our client would ask the Inspector to note their serious concerns over the LPA's reliance on CHP plant to power the town given the doubts that were raised over the ability that exists to deliver the relevant infrastructure in a timely manner to support the development proposed.
- 1.2 Significant doubt was raised at the hearings on the ability for this infrastructure to be delivered in a timely fashion, not least because it requires commercial buy-in from an energy provider to deliver such facilities. Having heard the debate at the earlier hearing sessions, we are also mindful that the CHP system proposed has one operator and in this regard it is not consumer friendly e.g. there are no competitors in the market and the infrastructure is operated by a sole provider.
- 1.3 Whilst we await the LPA's response to the question set out by the Inspector, there were doubts raised about the use of CHP on the following matters:
- The capacity of the existing infrastructure (e.g. more plant is needed);
 - It is expensive plant to deliver (reflected in the IDP costs attributed) and the existing plant was heavily subsidised when delivered;
 - The current system runs off gas, not pyrolysis so doesn't deliver the sustainability objectives EDDC had initially anticipated.



- 1.4 On the basis of the information previously presented, our client has concerns that CHP is not to be relied upon and that more traditional utility connections and provision ought to be considered, especially for sites like Farlands that are envisaged as an early release site to boost housing delivery numbers.
- 1.5 Regard should also be had to more recent Government Guidelines and Regulations which seek to reduce carbon emissions with design of buildings. The rationale for CHP has to an extent been eroded by subsequent energy efficiency measures being introduced.
- 1.6 We will review the LPA's hearing statement once published.