

The Cranbrook Plan
Planning Policy
East Devon District Council
Blackdown House
Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ

Emailed to: plancranbrook@eastdevon.gov.uk

28 February 2022
WCN053/nf

Dear Sirs

**CRANBROOK DPD
Proposed Modifications Consultation
Representations by Hallam Land Management and Taylor
Wimpey Developments (HLM/TW)**

Further to your recent correspondence I am grateful to you for the opportunity to comment and make representations on the Proposed Main Modifications to the Cranbrook DPD that have now been published.

I am pleased to attach representations in relation to the following Main Modifications: MM3; MM9; MM10; MM11; MM12; MM15; MM16; MM18; MM23; MM25; MM28; MM30; MM33; MM34 and MM35.

In addition I hope that the following general observations are helpful as context for the representations.

Extant Objections

As you are aware HLM/TW have made extensive representations in relation to many policies of the DPD in particular CB2; CB6 (Infrastructure Delivery); CB7(Phasing); CB10 (as renumbered-Affordable Housing); CB11(as renumbered-Custom and Self Build); CB12(as renumbered, Delivering Zero Carbon); CB14(as renumbered-SANGS); CB21 and CB22 (as renumbered-Cranbrook Town Centre). Such representations were set out at Submission stage and have been throughout the examination process.

In these matters it is disappointing that many, and indeed most, of the matters raised have not been picked up and addressed in the Main Modifications.

Such representations generally remain extant and remain for the Inspector to consider in any further modifications.

The representations made now by HLM/TW, in response to the Main Modifications, are limited to those changes that are proposed to be made. Earlier representations are not repeated.

Cranbrook IDP and Viability

Much of the objection to the Submission Plan and subsequent extended time period of the Examination has arisen as a result of concerns of the potential developers of the Cranbrook expansion

DAVID LOCK ASSOCIATES LIMITED

50 North Thirteenth Street
Central Milton Keynes
Buckinghamshire
MK9 3BP

☎ +44 (0) 1908 666276

✉ mail@davidlock.com

🌐 www.davidlock.com

areas. A particular focus of this has been the anticipated costs of the financial implications of the policy expectations in the DPD and, in particular, the potential section 106 contributions as set out in the various versions of the Cranbrook Infrastructure Delivery Plan (IDP).

HLM/TW welcomes the deletion, through MM9, of references in CB6 to the Cranbrook Infrastructure Delivery Plan. HLM/TW, along with other developers has been clear that, it could not sign up to the IDP – and the financial contributions set out therein –if the detail was intended as policy commitment or expectation.

HLM/TW suggest some additional clarifications for even greater certainty.

However HLM/TW remain very concerned regarding the level of provision that may be expected within the Framework provided now by the modified CB6. It isn't and cannot be clear that the wording – the framework – will ultimately accord (in the final contributions it seeks) with NPPF guidance in relation to the deliverability of development and section 106 contributions.

As a consequence HLM/TW continue to lack confidence that there is a robust viability assessment, accepting that the modifications provide a framework rather than detailed policy.

In the light of the above HLM/TW reserve the right to present a viability case, employing proper valuation methods and processes, and based on the actual rather than assumed circumstances. Any such case must be capable of being raised and heard in relation to planning applications for Bluehayes (and indeed other expansion areas).

Cranbrook Town Centre

The Cranbrook DPD has a particular focus on the definition and delivery of the expansion areas at Cranbrook.

The first 3500 dwellings at Cranbrook are largely completed with the reminder committed.

During the course of the examination considerable progress has also been made between the parties in the delivery of the Cranbrook Town Centre. It will be incumbent on all of the parties to complete the respective agreements in relation to the Town Centre without a revisiting of the basis of the agreements that have been achieved. Rather than amend some of the wording in the DPD in relation to matters pertaining to the town centre, it is envisaged that the agreements so far reached will be affirmed and not changed, or added to, in the light of the adoption of the DPD.

If you have any queries then please do not hesitate to contact me.

Yours sincerely,



NICHOLAS FREER
CHAIRMAN

Email: 