Comments

Site Specific Part 2 Local Plan - Publication Plan Consultation (18/12/19 to 12/02/20)

Comment ID 191
Response Date 12/02/20 12:53
Consultation Point Policy CRA1 Cranford Development Principles (View)
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Representation

Please use a separate form for each representation.

Which part of the Publication Plan does your representation relate to?
Policy CRA1

Tests of Soundness

Do you consider the Local Plan is sound in terms of being:

Justified . No
Effective . No
Positively prepared . No
Consistent with National Policy . No

Legal and Procedural requirements

Do you consider the Local Plan has been prepared in line with legal procedural requirements? Yes

Duty to Cooperate

Do you consider the Local Plan to be compliant with the Duty to Cooperate? Yes

Reasons

Please give the reason(s) why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the statutory Duty to Cooperate.
1.1 On behalf of our client Cranford Management we object to the wording of proposed Policy CRA1.

1.2 The policy is a wholly unrealistic and is not effective in its wording nor justified. Part a) of the policy advises that “development will seek to deliver affordable housing to meet an identified local need”. Presumably development unrelated to new housing would not be expected to seek to deliver affordable housing, whereas the policy as drafted infers this. The policy therefore lacks clarity and is ineffective. The policy also does not consider the deliverability or viability of affordable housing in the village as a standalone scheme.

1.3 Part b) appears as a shopping list of enhancements to the village including a play area and various public realm improvements. The phrase ‘maximising the bridge’ at part iv) is ill-defined and no further guidance is given in the supporting text as to how this is achieved. It is noted the bridge has a deep cutting either side with extremely narrow footways. Without further clarification or justification the text is unclear as to what ‘maximising’ involves. Nor does the Rural Masterplanning report give any guidance. The text also refers to maximising the gulley (next to the bridge) which is the line of the former railway line. This area is small there is no public access to it and is steeply sloping in two directions (as a gulley). It currently offers a well treed area and a biodiversity refuge. Again, not clarification is given as to what this area is expected to deliver through its ‘maximisation’.

1.4 Part c) advises development in Cranford will be referenced to Scattered Rural Character Areas as identified in the Rural Masterplanning report. The date of the report is not identified in the policy however the only report that emerges from asearch in the Council's web pages is dated 2012. This is an evidence base document divided into ‘Borough-wide principles for rural development’ and ‘Village-by-village analysis and development principles’. There does not seem to be a section on Historic Traditional and Scattered Isolated Rural character areas as is suggested in emerging policy CRA1. The policy therefore lacks clarity and is not effective. In addition, the Rural Masterplanning report as a 2012 document is dated and already 7 years behind the submission version of the plan. The document was intended as an evidence base to inform policy and not become policy in its own right. It has not been consulted on independently. It has not been updated since the Issues consultation on the plan in March 2009 and does not take account of the comments made to the Options consultation in 2012. The reference to this document is unjustified and should be deleted. The relevant references are to emerging Policy RS5 General Development Principles in the Rural Area and the remaining policies in the chapter covering Cranford (on which further comments on these are made in our separate representations).

1.5 Part d) requires “Use a limited palate of materials of local limestone, and thatch or slate”. This requirement is too restrictive and does not allow for localised variation or different types of building.

**Proposed Actions/Changes**

**Please explain what changes or actions are needed to make the Local Plan legally compliant.**

1.6 A preferred wording of policy CRA1 would be:Policy CRA1 Cranford Development Principles

| Developments may incorporate private market housing where a viability assessment demonstrates this would be necessary to bring forward the affordable housing.**b.**  
| Facilitate where appropriate, the following identified improvements to the village by**c.**  
| Creation of a children’s play area.**ii.**  
| Enhancements of gateways into the village from the west and particularly the east, potentially maximising the bridge and gulley at Duck End (south) over the former railway line.**iv.**  
| Enhancing of gateways into the village from the west and particularly the east, potentially maximising the bridge and gulley at Duck End (south) over the former railway line.**iv.**  
| Introduction of street treatments and street furniture appropriate to the historic and rural context.**v.**  
| Take their design, character and materials cues from the character of Historic Traditional and Scattered Isolated Rural character areas, as identified in the Rural Masterplanning report.**d.**  
| Use a limited palate of materials of local limestone, and thatch or slate.**e.**  
| Reflects the scale, mass, form, height and density of the historic pattern of development.**f.**  
| Protects important public views, particularly those of St Andrew’s Church and Cranford Hall; and does not result in the loss of historic front gardens.**g.**  

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for structures or car parking. h. Introduce street treatments and street furniture appropriate to the historic and rural context, for example, setts for kerbs and bonded pea shingle for path and road surfaces; and retain and, where necessary, enhance original features such as the water hydrants.

Attendance at the examination hearings

If you are seeking to change the Plan, would you like to attend the examination hearings? Yes

If Yes, please outline the reason(s) why, below.

In order to help and support the inquiry process in the full understanding of the issues under consideration.

Notifications

Do you wish to be notified? 

. When the Plan is submitted for independent examination?
. When the Inspector’s Report is published?
. When the document is adopted?