

Further Representations on East Devon District Council's Cranbrook  
Local Plan

Inspector's Draft Matters, Issues and Questions For Examination

On Behalf of Stuart Partners Ltd

Land to the West of Gribble Lane Grange Expansion Area

8 January 2020

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## 1. Introduction and Summary of Our Client's Position

### Background

- 1.1. McMurdo LPD Ltd ("McMurdo") acts for *Stuart Partners Ltd* ('client'), who controls *Land to the West of Gribble Lane* in (CB5) *the Grange Expansion Area* of the Cranbrook Plan (please refer to Appendices 1 and 2).
- 1.2. The Council know that our client is a well-known landowner and developer with a proven track record of delivering high quality strategic development projects, including residential and commercial developments with significant elements of green infrastructure and SANGS, ultimately creating homes, jobs, wealth and prosperity for East Devon and its sub region.

### Cranbrook Masterplan

#### 1.3. Our client:

- **supports** the proposed allocation of their land comprising residential development and associated open space and green infrastructure, including Suitable Alternative Natural Green Space (SANGS) and is fully committed to making their land available for the proposed uses in short timescales; importantly they can deliver the objectives of The Cranbrook Plan and the land uses identified in the papers without reliance on third parties.
- **supports** the relevant policy wording which states that an equalisation of costs (as far as possible) needs to be achieved across the parcels to make sure that development can proceed at market pace.
- **supports** the overarching framework for the principles of development, which means that applications which comply with it should be approved without delay. (A "roof-tax" approach to planning obligations is appropriate whether there are agreed comprehensive development and phasing plans in place or not).
- **supports** the proposed zero CIL rate and 15% affordable housing requirements.

#### 1.4. However, our client:

- whilst supporting the allocation in principle, **objects** to the proposed built up area boundary of the Grange Expansion Area and does not agree with the Council's conclusion that the natural drop in ground levels to the south of the Grange Expansion Area acts as a natural boundary to development and would restrict the further expansion of Cranbrook in this direction; instead, backed by detailed consultancy input, our client understands that this area of land has some development potential if developed sensitively and respectfully *asks that the Cranbrook Masterplan boundary is altered slightly to accommodate their significantly better option as*

*proposed in their submitted application (East Devon District Council Reference 19/1798/MOUT).*

- **objects** to strict phasing controls (Policies CB6 and CB7, in particular, refer) and respectfully *asks that words attempting to strictly control phasing be removed from the policies in the Plan and replaced with words encouraging pliable (e.g. “roof-tax”) approaches to planning obligations and the delivery of expansion area and allocation wide infrastructure.*

### **Submission of Outline Planning Application**

- 1.5. Our client has submitted an outline planning application for up to 200 dwellings in the CB5 Grange Expansion Area. For solid technical reasons, it does not fully comply with the proposed built up area boundary.
- 1.6. The main differences between their application layout and the Cranbrook Masterplan layout are:
  - the Cranbrook Masterplan Layout shows C 200 houses obliterating ancient trees in a parkland setting and delivering C 5 Ha of SANGS and no internal open spaces;
  - they show C 200 houses retaining ancient trees in a parkland setting, delivering C 5Ha of SANGS and C 7Ha of quality internal open spaces just outside of the proposed boundary but without any harm whatsoever.

### **Council Requests Small Changes to Our Layout**

- 1.7. Upon submission of the application and following a meeting with Council Officers we were asked to make a small change to the layout to ensure that the proposed SANGS links with and flows into the other SANGS proposed as part of the Cranbrook Masterplan, strongly implying that Officers agree that this approach, which is underpinned by far greater technical detail than that gathered by the Council, is better than the high level approach as outlined in the Masterplan.

### **Desired Changes to the Plan**

- 1.8. Our client respectfully suggests that:
  - the Cranbrook Masterplan built up area boundary is altered slightly to accommodate the significantly better option as proposed in submitted application East Devon District Council Reference 19/1798/MOUT; and,
  - words attempting to strictly control phasing be removed from the policies (e.g. CB6 and CB7) in the Plan and replaced with words encouraging pliable (e.g. “roof-tax”) approaches to planning obligations and the delivery of expansion area and allocation wide infrastructure.

## 2. Response to Inspector's Draft Matters, Issues and Questions for Examination

### Matter 1 Issue 2 Inspector's Question 14

2.1 **Q14.** There is little or no synergy between this Plan and GESP, reflected in the DTC.

2.2 After several years GESP still has no governance structure and its intended use as a vehicle for delivering cross boundary strategic development policy is at best questionable which is the primary issue for the sub-regional economy.

2.3 Amplifying:

- East Devon District Council probably has a 5-year housing land supply at the moment, but a report prepared for East Devon Members (Strategic Planning Committee Papers) advises that the supply has softened (considerably and will continue to soften unless the Cranbrook Masterplan allows for multi-site, quick, market-led, delivery).
- Exeter City Council has less than 2 years housing land supply and has failed to have a 5-year housing land supply every year for the last 10 years.
- Exeter is the economic driver for the sub-region and its growth cannot be constrained for social and economic reasons. But its policy is out of date and its vision to develop housing on high value employment land is undeliverable (and certainly undeliverable in the short term without significant public sector intervention) and would negatively affect the sub regional economy in any event. (Why would it be right to build housing on high demand (and high value) employment land?).
- In other words, the City has no land left and it has to grow into East Devon (and Teignbridge) district(s). The underlying reason for the GESP.
- There are no guarantees that the GESP will come to fruition any time soon. Given the time it has taken to get to this stage with GESP, it is fair to conclude that there may be little political desire to create it and that each Local Planning Authority will revert to working on their individual Local Plans. If GESP does come forward there's a long way to go.

2.4 The main point here regarding the Cranbrook Masterplan and its relationship with GESP is that in the absence of GESP, all strict phasing controls (in e.g. CB 6 and CB7) must be omitted from the Masterplan to allow for quick, multi-site, market-led delivery.

James McMurdo MRTPI MRICS

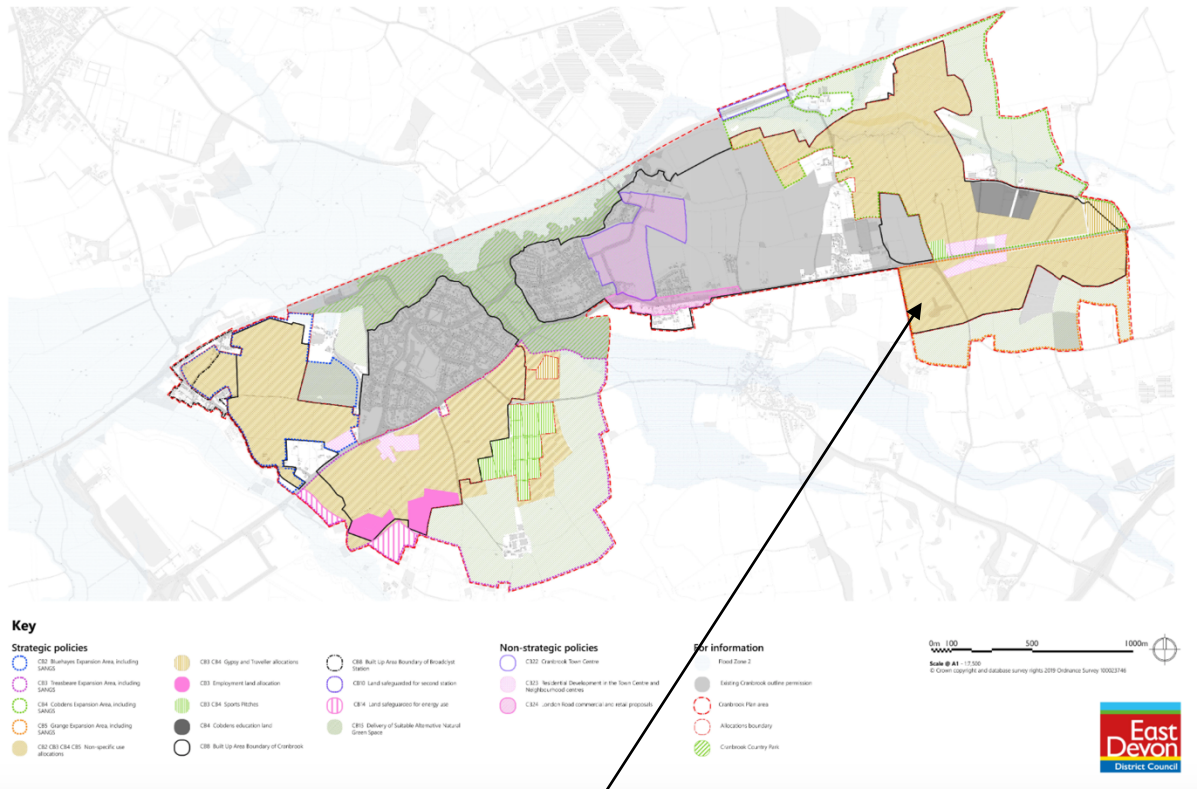
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**For Stuart Partners Ltd**

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## Appendix 1

### Cranbrook Plan - Policies Map



Site  
URN 147;  
EDDC Application Reference No 19/1798

**Appendix 2 Appendix 2: Illustrative Masterplan 19/1798/MOUT**

