

## East Devon Local Plan – 2021 to 2040 - Issues and Options consultation for the attention of the Planning Policy team

We would encourage you to complete the on-line response form – see:

<https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/initial-consultations/>

Please only use this paper version of the questionnaire if you lack internet access. Receiving on-line submissions will help us save time and money and will mean we can be more accurate in our work.

Your Title MR First name JAMES Surname MCMURDO  
or initial

Your email address

Your telephone number

Your postal address and post code

Basement office, 4 Baring Crescent, Exeter, EX1 1TL

Organisation name (if relevant)

MCMURDO LPD

If you are an agent acting for a client  
please provide the name of your client

Stuart Partners Ltd

### Your Age Range

- 0-18
- 19-25
- 26-40
- 41-55
- 56-70
- 70 plus

In what capacity are you responding to this consultation - what most closely describes you or if you are an agent what best describes, in respect of this consultation, what your client does?

- Private individual
- Environmental body
- Government department or agency
- Local authority
- Parish or town council
- Politician
- Religious body
- Cultural group or body
- Education provider
- Amenity group
- Land owner
- Developer
- Private company
- Emergency service provide
- Utility or transport provider
- Community or resident group
- Representative of commercial organisation or business
- Other – Please specify (in the box below)

### **Guidance notes**

We have produced a local plan issues and options consultation document that we are consulting on from 18 January 2021 to midday on 15 March 2021. In the consultation document we include a series of questions. Please note that this questionnaire should be read alongside the full consultation document.

Please respond to this consultation event, on-line, if possible, see:

<https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/initial-consultations/>

Paper copies of this completed of this questionnaire should be posted to:

Planning policy  
East Devon District Council  
Blackdown House, Border Road  
Heathpark Industrial Estate  
Honiton  
EX14 1EJ

To arrive no later than 12.00 noon on Monday 15 March 2021.

### **Data Protection**

Any personal information which you provide will be held and used by East Devon District Council for the purpose of local plan production. Your information may also be shared within East Devon District Council for the purposes of carrying out our lawful functions. Otherwise your personal information will not be disclosed to anybody outside East Devon District Council without your permission, unless there is a lawful reason to do so, for example disclosure is necessary for crime prevention or detection purposes. Your information will be held securely and will not be retained for any longer than is necessary. There are a number of rights available to you in relation to our use of your personal information, depending on the reason for processing. Further detail about our use of your personal information can be found in the relevant Privacy Notice which can be accessed at: <https://eastdevon.gov.uk/access-to-information/data-protection/privacy-notices>

Please note that responses received will not be treated as confidential and they will be published on our council web site along with your name and if relevant the name of the organisation you represent. If you are an agent your name and organisation will be published as well as those of your client. Postal or email address will not be published unless they are embedded in documentation and cannot be readily blacked out.

Representations to East Devon Local Plan 2021 to 2040  
Issues and Options Consultation January 2021  
On Behalf of Stuart Partners Ltd

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For Stuart Partners Ltd 18/1/2/3 19/5

## Executive Summary

- It is in the interests of all concerned that East Devon's Local Plan is found “sound” at examination as soon as possible and Stuart Partners Ltd (“client”) supports the Council’s overarching objectives and general thrust of the East Devon Local Plan 2021 – 2040 Issues and Options Consultation, fully endorsing the Council’s proposed approach (to have a single Local Plan to deal with all policy issues).
- In line with Sustainability Appraisal (SA) work commissioned by it, the Council should continue to encourage development away from protected landscapes afforded the highest level of national planning policy direction (e.g. World Heritage Site; Area of Outstanding Natural Beauty (2/3 of the district is covered by an AONB designation)) and into the “West End” of the district where the vast majority of key physical, social and community and green infrastructure exists or is planned for.
- Homes cannot be delivered in isolation and must be built in combination with employment land delivery.
- The Council’s stated position in terms of the role neighbourhood plans should have in strategic policy evolution, related decision taking, and where strategic development is likely to go, is eminently sensible and fully supported by our client (The Council: *“As the Local Plan will be adopted after neighbourhood plans have been adopted, its adopted policies will take precedence... and it is anticipated that, in the emerging Local Plan, much of East Devon’s strategic growth will continue to be directed to the District’s “West End”... an area which is long recognised as the most sustainable option for accommodating future sub-regional strategic housing and employment needs, balancing environmental impacts with necessary social and economic gains.*)
- For the plan to be “sound” the Council should plan to build significantly more houses than 1,614 per annum, helping to meet ECC’s development needs, and creating plan resilience over time (in terms of e.g. housing land supply and affordability of homes).
- Largely for sustainability and economic reasons, our client strongly supports a blend of continuing to focus employment provision in East Devon’s “West End” and encouraging further business development at the highly successful Hill Barton and Greendale Business Parks.
- Given that it is very likely that the development needs of East Devon will have to be met via new towns (like Denbow) and/or detached urban extensions, supplemented by large scale urban expansions to existing towns (like Cranbrook and Pinhoe) and villages (as well as supplementary employment land at Hill Barton), the Council should plan for a longer period, extending the plan period in line with the draft NPPF which takes a minimum 15 year horizon forward stating (at Paragraph 22) “where larger scale developments such as new settlements form part of a strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years)...”

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### Executive Summary

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## 1. Introduction and Background

- 1.1. We represent Stuart Partners Ltd (“client”) which has significant land tranches in the “West End” of East Devon district, some of which have active planning applications on them, others are being promoted via planning policy routes. (Please see Appendices 1 client land at Denbow and Hill Barton, 2 client land at Cranbrook, 3 client land at Pinhoe ,4 client land at Pinhoe)
- 1.2. Our client is a local company with a diverse business portfolio based around agriculture, land, renewable energy and employment delivery, all contributing considerably in excess of 1,000 jobs and £100 Million Gross Value Added (GVA) into the East Devon and sub regional economies.
- 1.3. It has in excess of 1,000 acres in the “West End” of the district and owns and controls the strategically important Hill Barton Business Park. It has delivered land for around 1,000 houses in East Devon, more than 25% of the total of which have been affordable homes.
- 1.4. Consequently, our client is interested in strategic planning policy evolution in the sub-region and in East Devon district in particular. Our representations, which should be read in conjunction with those made by Turley, to do with Denbow Garden Village, on behalf of our client and Bloor Homes South West, are made on that basis.

## 2. Relevant National Planning Policy

2.1. In the preparation of this document our client has paid particular attention to the content of the National Planning Policy Framework (“NPPF” “Framework”) and in particular Paras 7-11,16,-27<sup>1</sup>, 31-35 and 72 of it.

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<sup>1</sup> NPPF 2021 draft at Para 22 states that a 30-year time horizon is appropriate if a Council’s strategy involves e.g. new settlements and detached urban extensions

### 3. Response to Issues and Options

#### Question 1 - Local Plan Objectives

##### Response

- 3.1. Broadly, our client endorses these laudable objectives but may take issue with them if they are in numbered priority order.

#### Question 2 – The Scope of the Local Plan

##### Response

- 3.2. Our client fully endorses the Council's proposed approach (to have a single Local Plan to deal with all policy issues).

#### Question 3 - Neighbourhood Plans and the New Local Plan

##### Response

- 3.3. Paragraph 13 of the National Planning Policy Framework (NPPF) advises that *“neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is **outside of these strategic policies**”*
- 3.4. In this regard, very helpfully, EDDC has recently and clearly stated its position, which our client welcomes and fully supports.
- 3.5. To explain, in their recent “Report on Farringdon Neighbourhood Plan 2018 – 2031” the Inspector (at Paragraph 2.2) says: *“Concerns were expressed ... [including by our client] ... regarding the validity of preparing a neighbourhood plan in circumstances where the adopted Local Plan will “soon be out of date” .... [In this vein] .... EDDC has.... confirmed that it considers that the policies in the Farringdon Neighbourhood Plan (if made) would not unduly influence or constrain any emerging policies in the Local Plan review”.*
- 3.6. Drilling down a tad, we can see from Council Papers entitled “Responses to Examiner’s Initial Questions by East Devon District Council and/or Farringdon Parish Council” the Inspector asked EDDC a specific question, thus: *“Can the Council confirm that the policies in the Farringdon Neighbourhood Plan, if made, would not unduly influence or constrain any emerging policies in the Local Plan...?”*; to which the Council responded, *“Yes, the Council is able to confirm this...As the Local Plan will be adopted after the neighbourhood plan, its adopted policies will take precedence...Farringdon is well placed in relation to Exeter, and it is anticipated that, in the emerging Local Plan, much of East Devon’s strategic growth will continue to be directed to the District’s “West End”...*

3.7. The Council's position in terms of the role neighbourhood plans should have in strategic policy evolution, related decision taking, and where strategic development is likely to go, is eminently sensible and fully supported by our client.

#### Question 5 - Energy Efficiency of New Buildings and Question 7 - Carbon Saving Measures

##### Response

3.8. The Local Plan should mirror the Government's approach and other relevant legislation (e.g. building regulations), taking care to ensure that relevant proposed policies do not undermine the viability or deliverability of the plan.

3.9. Carbon saving measures are best achieved by locating strategic developments into areas where the vast majority of key physical, social and community and green infrastructure exists or is planned for. The Council acknowledges that for East Devon that means locating strategic developments in its "West End" (please see above).

#### Question 8 - How many new homes should we plan for each year?

##### Response

3.10. This is not a straightforward district wide issue: EDDC will have to demonstrate that it has worked collaboratively with, amongst others, Exeter City Council (ECC) ("duty to co-operate"). And, based on a thorough analysis of the options ECC is pursuing in this regard, land in East Devon district will be required to meet a significant portion of ECC's identified development needs.

3.11. On that basis alone, unfortunately, neither Option 1 nor Option 2 are credible options for the Council to pursue. Option 1 (918 hpa) does not align with "Government thinking" and whilst Option 2 (1614 hpa) does, it does not take into account the "duty to cooperate" with a city neighbour that cannot meet its identified development needs.<sup>2</sup>

3.12. For the plan to be "sound" a bespoke Option 3 should be pursued. Such an option (or options) should plan to build significantly more houses than 1614 per annum, helping to meet ECC's development needs, and creating plan resilience over time (in terms of e.g. housing land supply and affordability of homes)

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<sup>2</sup> National Policy and Guidance advises that Local Housing Need Standard Methodology is a minimum requirement.

## Question 9 - Sites for Small Scale Housing Developments

### Response

3.13. Our comments on spatial strategy and development hierarchies are elsewhere in these representations, however, the lower end of option 2 should be the route that the Council takes because:

- it will only attain the housing numbers it needs via e.g. new towns and significant scale detached urban extensions (to Exeter); and,
- 10% is the minimum level as required under NPPF Paragraph 68.

## Question 10 - Planning for Housing for People at all Stages of Their Life and Question 11 - Additional Housing Policy Objectives

### Response

3.14. Evidence of need should be the starting point; then identified need will have to be considered holistically with other higher tier policy objectives, relevant guidance, and plan viability and deliverability.

## Question 12 - Preference for Location for Future Job Provision, Question 13 - Differing Jobs Sectors in East Devon and Question 14 - Additional Economic Policy Objectives

### Response

3.15. Largely for sustainability and economic reasons, our client strongly supports a blend of continuing to focus employment provision in East Devon's "West End" and encouraging further business development at the highly successful Hill Barton and Greendale Business Parks.

3.16. Amplifying, there is an undeniable need for employment development now and the existing employment areas around the A3052 corridor, (i.e. Hill Barton and Greendale Business Parks) is superbly located to access international (Exeter Airport); national and local transport networks and to serve the "West End" of East Devon and sub regional markets.

3.17. The inherent suitability of this area to accommodate employment development is demonstrated by the success of Hill Barton and Greendale and they should be allowed to grow to supplement other planned strategic growth in the "West End" and/or in areas close to it.

- 3.18. For the sub regional economy to be successful, a constant stream of diverse employment space will have to be provided in order to meet a range of different occupier needs and to ensure that these areas cater for local as well as wider employment needs.
- 3.19. Delivering jobs in tandem with, and close to, housing (e.g. at Denbow) is the most sustainable strategic development pattern.
- 3.20. In terms of jobs generation, a job is a job! All jobs create prosperity and our client strongly supports all of the approaches to future job provision.
- 3.21. In summation (Q14) we reiterate, that our client strongly supports what seems to be the Council's preferred option: a blend of continuing to focus employment provision in East Devon's West End and encouraging business development at Hill Barton and Greendale Business Park.

#### Question 19 - The Importance of Conserving and Enhancing Heritage Assets and Question 20 - Development in Protected Landscapes

##### Response

- 3.22. Legislation and National planning policies together mean that it is "very important" for the Local Plan to "conserve and enhance" heritage assets but that does not mean that development cannot happen which affects such assets: impacts on heritage assets can sometimes be acceptable in planning terms.
- 3.23. Our client believes that the Council, in line with Sustainability Appraisal work commissioned by it, should continue to encourage development away from protected landscapes afforded the highest level of national planning policy direction (e.g. World Heritage Sites; Areas of Outstanding Natural Beauty; 2/3 of the district is covered by an AONB designation) and into the "West End" of the district where the vast majority of key physical, social and community and green infrastructure exists or is planned for.
- 3.24. In this vein, papers from the Council's Strategic Planning Committee from 2018, confirm that "the least constrained part of the district for accommodating... [strategic housing and employment] ... growth... [is]...the land...[which]...is relatively flat with no landscape designations... [and which] ... is well served by main roads with good vehicle access via the M5, **A30**, **A3052** and A376 and has good existing public transport links with the railway line and existing bus routes..."

#### Question 21 - Net Gains in Biodiversity

##### Response

- 3.25. Option 4: "a combination of the above" will almost certainly be required.

## Question 22 - Additional Natural Environment Policy Objectives

### Response

- 3.26. In principle, our client fully supports additional natural environment policy objectives (such as the Clyst Valley Regional Park Masterplan) **provided they are examined as part of the Local Plan.**

## Question 23 - Promoting Accessibility by Walking and Cycling and Question 24 - Additional Sustainable Transport Policy Objectives

### Response

- 3.27. A blend of Options 1 and 2 is required.
- 3.28. Aggressive multi modal splits are best achieved by locating strategic developments into areas where the vast majority of key physical, social and community and green infrastructure exists or is planned for. The Council acknowledges that for East Devon that means locating strategic developments in its “West End”. Our client fully supports all sustainable transport policy objectives.

## Question 25 - Facilities and Services That are Important and Question 26 - Additional Infrastructure and Service Provision Policy Objectives

### Response

- 3.29. From the Cranbrook Plan examination and the Inspectors guidance to the Council in relation to it, it is clear that facilities and services (infrastructure) that are required to make development acceptable in planning terms is not the same as a “wish list”.
- 3.30. In this vein, the Council will know that:
- Planning Practice Guidance advises that it should “engage with landowners, developers, and infrastructure and affordable housing providers to secure evidence on costs and values to inform viability assessment at the plan making stage”;
  - Paragraph 34 of the National Planning Policy Framework (Framework) advises that plans should set out the contributions expected from development and that such policies should not undermine the deliverability of the plan,

and our client looks forward to further dialogue with the Council and other stakeholders as the plan advances.

Question 27 - Retaining and Refining the Existing Settlement Hierarchy, Question 28 - Broad Distribution of Housing Development, Question 29 - Future Options for the Type and Location of Development Question 30 - Establishment of a Development Corporation Question 31 - Planning for Development Beyond 2040

Response to Q 27,28,29,30,31

- 3.31. Given that our client very strongly supports Option 2 for a “More “West End” Focused” distribution for housing (and employment; see above) development, we suggest that for settlement hierarchy the Council should pursue a bespoke Option 4 based on Option 2, to be informed and tested by a Sustainability Appraisal (SA) (though there is no reason to suggest that the findings of that Sustainability Appraisal would be different to the findings of the SA underpinning the existing Local Plan), all of which would probably lead to planning for one or more additional new towns (like Denbow) and/or detached urban extensions (to Exeter) in East Devon’s “West End” (or close to East Devon’s “West End”) supplemented by development in the form of large scale urban expansions to existing towns (like Cranbrook and Pinhoe) and villages (strategic employment growth will have to be delivered in tandem including at, for example, Hill Barton).
- 3.32. Regarding the creation of a development corporation the reasons given for such in the issues and options consultation papers are not relevant in East Devon so far as our client can see. (e.g. there is no need for “Master Developer”; the market has acquired positions on land without help from a development corporation; planning controls exist to ensure proper Masterplanning and to prevent financial burdens on future residents; and state funding can be effectively secured by strong public/ private sector partnerships).
- 3.33. Given that it is very likely that the development needs of East Devon will have to be met via new towns and/or detached urban extensions, supplemented by large scale urban expansions to existing towns and villages, the Council should plan for a longer period, however, and extend the plan period in line with the draft NPPF which takes a minimum 15 year horizon forward stating (at Paragraph 22) “where larger scale developments such as new settlements form part of a strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years)...” (Development corporations may have a role to play in such a time horizon.)

Question 32 - And finally...?

Response

- 3.34. No more comments at this stage.

#### **4. Conclusions**

- Our client fully endorses the Council's proposed approach to have a single Local Plan to deal with all policy issues.
- Strategic housing and employment development should be located in the "West End" of the district where the vast majority of key physical, social and community and green infrastructure exists or is planned for, like Denbow, Cranbrook and Pinhoe.
- More than 1,614 houses per annum will be required, in particular to help meet ECC's development needs.
- Further business development at the highly successful Hill Barton and Greendale Business Parks should be a cornerstone of "West End" strategic planning (along with Denbow).
- The plan period should be extended to at least 30 years.

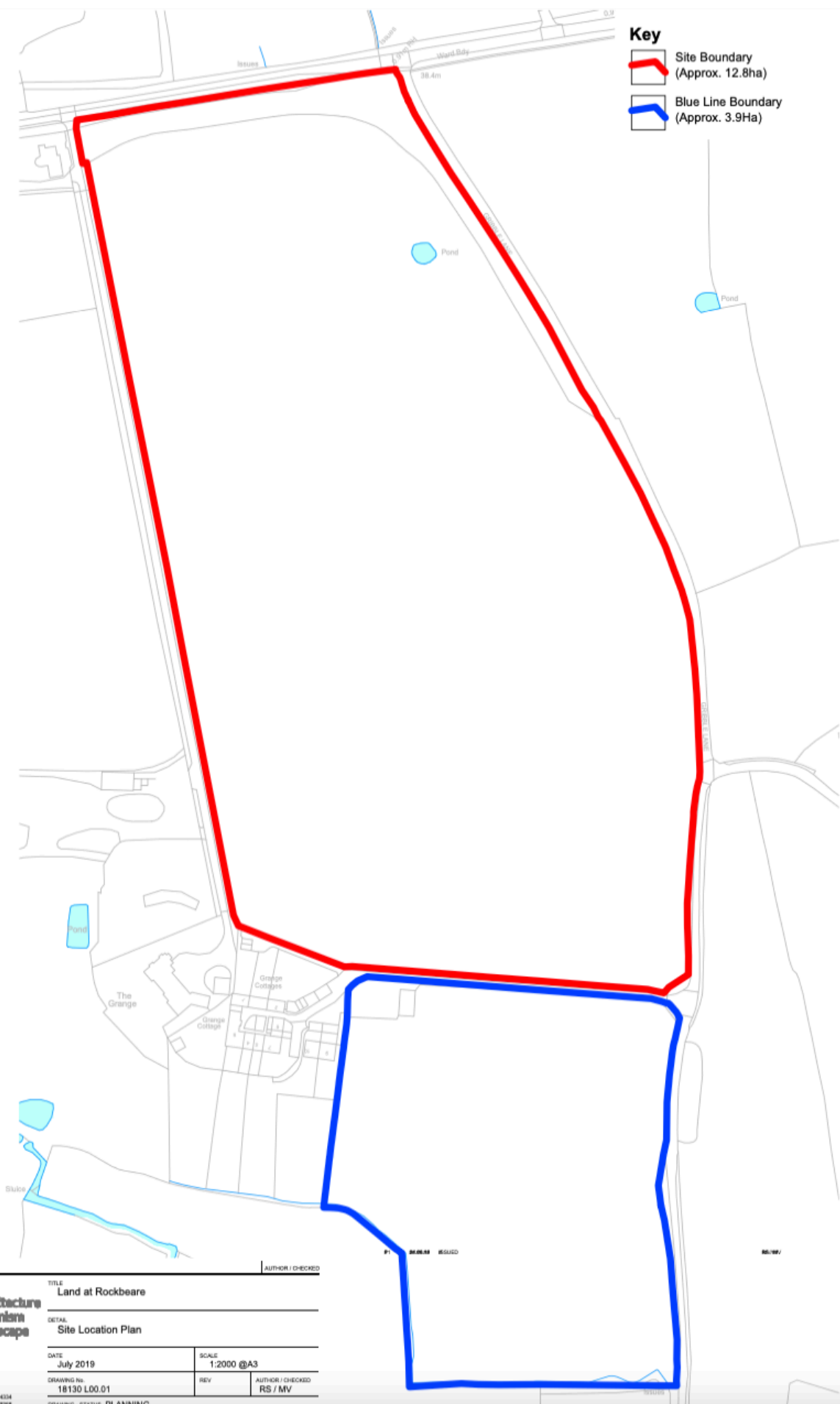
**5. Appendices**

## Appendix 1





## Appendix 2




**Key**

- Site Boundary (Approx. 12.8ha)
- Blue Line Boundary (Approx. 3.9Ha)

REVISION	DATE	COMMENTS	AUTHOR / CHECKED

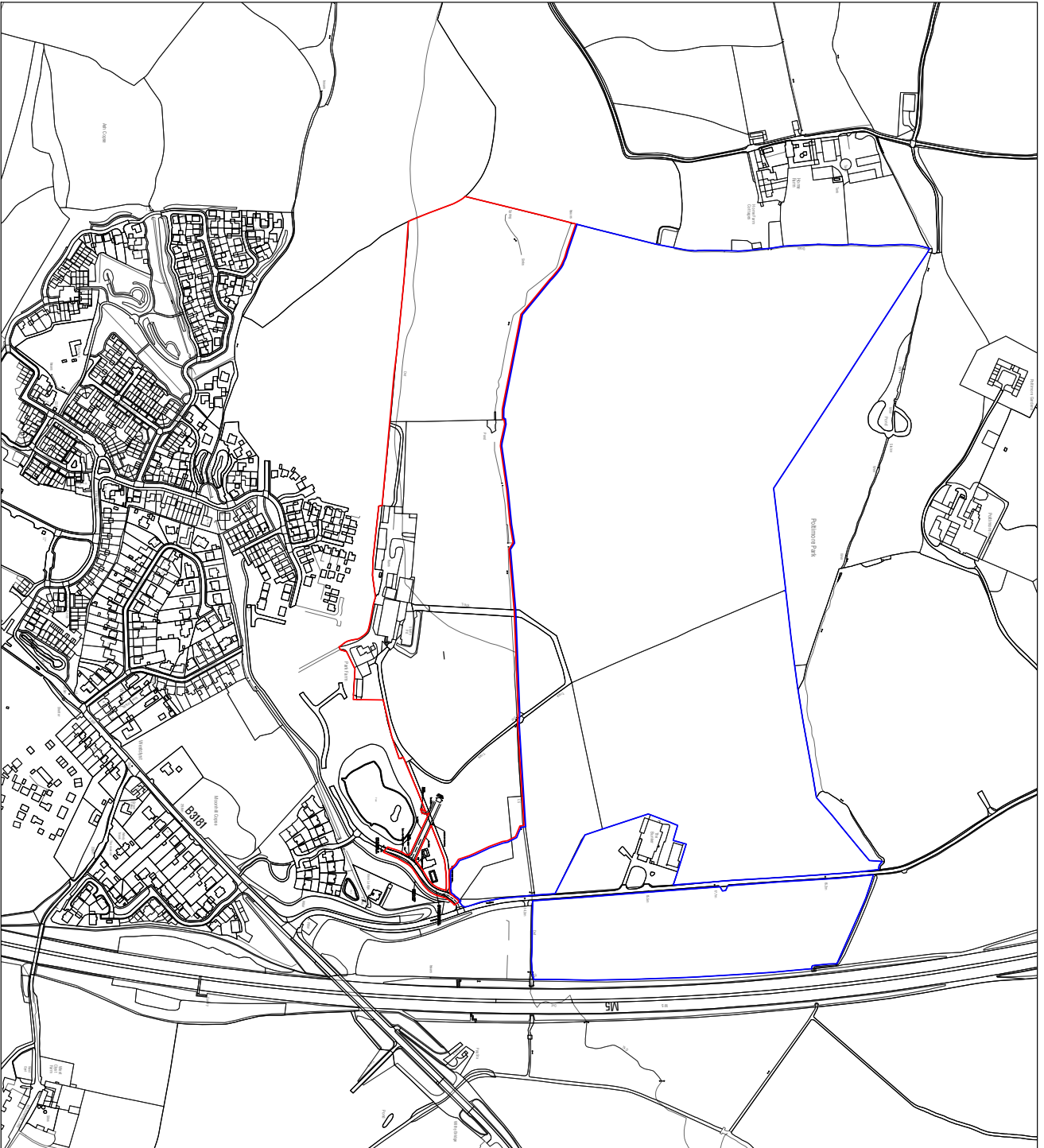
  

 <b>architecture urbanism landscape</b>		<b>TITLE</b> Land at Rockbeare	
		<b>DETAIL</b> Site Location Plan	
<b>DATE</b> July 2019		<b>SCALE</b> 1:2000 @A3	
<b>DRAWING No.</b> 18130 L00.01		<b>REV</b> RS / MV	
<b>DRAWING - STATUS</b> PLANNING			

<b>EXETER</b> 01392	<b>PLYMOUTH</b> 01752	<b>44434</b> 08908
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## Appendix 3



NOTES

- Application boundary
- Other land within applicants' ownership and/or control

Notes

C	Redline Amendment	30 <sup>th</sup> July 2019	RW
B	Redline Amendment	13 <sup>th</sup> May 2019	RW
A	Redline Amendment	9 <sup>th</sup> May 2019	RW

REV | NOTES | DATE

Park Farm, Pinhoe  
 Location Plan  
 18002.L 01 01 | 15,000 @ A3 | C | RW/DCC | Jun 2019

**CliftonEmerydesign**

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**DRAWING STATUS Planning**

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## Appendix 4





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