



Mr Thickett
Care of Programme Officer (Amanda Coombes)
Council Offices
East Devon District Council
Knowle
Sidmouth
Devon
EX10 8HL

30 September 2015
Our Ref: WCN053

Dear Mr Thickett

**East Devon Local Plan Additional Work Incorporating Proposed Changes to the Plan (August 2015)
Comments by East Devon New Community partners**

- 1 Following the submission of the additional information and policy changes submitted to the Inspector by the Council I understand that there is an opportunity to comment on the material supplied – by today's date.
- 2 I set out the following comments on behalf of the East Devon New Community partners in respect of specific policy changes relating to employment and gypsy and traveller provision insofar as they relate to Cranbrook.
- 3 I have not reviewed, or commented upon, the Habitats Regulations Assessment update, the Sustainability Appraisal Update, the housing trajectory and monitoring updates or demographic scenarios.

Employment Provision at Cranbrook

- 4 The Council proposes two amendments to the Plan in relation to employment at Cranbrook:
 - a) The addition of a new paragraph after para 7.27 as follows: *"In Spring 2015 the Council published a draft Economic Development Strategy for Cranbrook that included reference to levels of B-class uses (office/ industrial/ warehousing). Paragraph 7.3 the strategy advises that in terms of employment land there is a total requirement for B-class uses of up to 8.7ha by 2030; and of 9.7ha for town centre and neighbourhood centre uses by 2030, making a total of 18.4ha in all. This level of provision is translated into plan policy with a phasing approach that requires quantified provision to be directly proportionate and linked to numbers of homes being occupied";* and
 - b) The amendment of Item 2 of Strategy 12 (the Cranbrook policy) as follows: *"Jobs - provision of at least 18.4 hectares of employment land shall be made throughout the town to provide a range of business spaces suitable for the needs of businesses as they develop and grow and to accommodate a range of*



employment opportunities for residents of Cranbrook and surrounding areas. Serviced or otherwise available land should be available for occupation by employment uses on a phased basis that is directly proportionate to house building:

- 4.5 hectares at/before 2,500 homes are occupied;*
- 9 hectares at/before 5,000 homes are occupied;*
- 13.5 hectares at/before 7,500 homes are occupied;*
- the remainder after 7,500 homes.*

Monitoring of take up of employment land and jobs provided will allow for future policy adjustment. Nearby West End employment sites will also provide jobs for Cranbrook residents and some will travel to other locations for work purposes including Exeter City.

- 5 EDNCp has set out its observations on the Draft EDDC Economic Development Strategy to the Council. In such observations EDNCp support the need to provide for employment at Cranbrook and, in particular, in the town centre, and have provided for employment of generally the scale envisaged by the Council in the expansion area planning applications.
- 6 Such support is not however unqualified. EDNCP are concerned that amended level of employment provision is likely to be at the upper end of what might be appropriate. The provision made appears to be justified by the Council's evidence base, in part, on drawing comparisons with employment in other non-comparable towns which do not have the same physical relationships and contexts – not least the key and long planned relationship of Cranbrook with other West End employment developments and the public transport synergies including with Exeter. Such long planned context should not be undermined. The words “at least” 18.4 hectares should therefore be deleted. The provision should be for 18.4 hectares if that is what is considered to be evidenced.
- 7 The proposed phasing provisions that the Council intends to introduce regarding employment land provision proportionate to house building is strongly opposed by EDNCp.
- 8 Procedurally this has not been considered as part of the Plan to date and introduces late new information to the policy that is not properly evidenced. Following the examination sessions in July the request from the Inspector had simply been for the Council to clarify its overall expectations as to how much employment land should be provided for.
- 9 The suggested additional policy wording is not appropriate or justified. The principal purpose of Cranbrook is to deliver the homes and related facilities and infrastructure that are required as part of the planned strategy for the West End (and which of course have a significant economic effect in their own right). Its rationale is to provide the new homes in the area to meet real needs. This must not be undermined by any suggestion that phasing of employment land provision is linked to house building – irrespective of employment demand.
- 10 Nor is such phasing necessary as the existing planning permission covering the delivery of the first 3500 dwellings including provision for the town centre that will include much of the sought after land. As has been noted above there is also the planned provision of employment adjoining Cranbrook in the West End. There are sustainable transport choices, planned and in place, to provide ready access to other locations in the vicinity. The Council's evidence does not reflect this context or long planned approach and instead is based on the circumstances of non comparable towns.



- 11 In order to ensure these latest changes can be made sound then the additional changes now sought by the Council should be further modified as below.
- 12 The addition of a new paragraph after para 7.27 should be further amended as follows:
"In Spring 2015 the Council published a draft Economic Development Strategy for Cranbrook that included reference to levels of B-class uses (office/ industrial/ warehousing). Paragraph 7.3 the strategy advises that in terms of employment land there is a total requirement for B-class uses of up to 8.7ha by 2030; and of 9.7ha for town centre and neighbourhood centre uses by 2030, making a total of 18.4ha in all. This level of provision is translated into plan policy with a phasing approach that requires quantified provision to be directly proportionate and linked to numbers of homes being occupied";
- 13 The amendment of Item 2 of Strategy 12 (the Cranbrook policy) should be further amended as follows: *"Jobs - provision of at least 18.4 hectares of employment land shall be made throughout the town to provide a range of business spaces suitable for the needs of businesses as they develop and grow and to accommodate a range of employment opportunities for residents of Cranbrook and surrounding areas. Serviced or otherwise available land should be available for occupation by employment uses on a phased basis that is directly proportionate to house building:*
 - 4.5 hectares at/before 2,500 homes are occupied;*
 - 9 hectares at/before 5,000 homes are occupied;*
 - 13.5 hectares at/before 7,500 homes are occupied;*
 - the remainder after 7,500 homes.**Monitoring of take up of employment land and jobs provided will allow for future policy adjustment. Nearby West End employment sites will also provide jobs for Cranbrook residents and some will travel to other locations for work purposes including Exeter City.*
- 14 The above comments are made without prejudice to those already before the Inspector – for instance the deletion of references to throughout the new community – which remain before the Inspector.

Cranbrook and Gypsy and Travellers

- 15 The Council proposes an amendment to the East Devon Local Plan policy in relation to Cranbrook that makes specific reference to Gypsy and Traveller provision as follows:
"provision will be made for new gypsy and traveller sites to accommodate up to 30 pitches on land allocated for Cranbrook development. Provision will be required concurrently with (though in the early years of) the 'bricks and mortar' housing development of the allocated land).
- 16 The Council has also consulted recently on the scope of a Gypsy and Travellers DPD. EDNCp have indicated that while EDNCp have agreed to include a site in the expansion area of Cranbrook, in responding to that consultation, EDNCp indicated that the need or otherwise for a site to accommodate gypsies and travellers at Cranbrook should not be determined in isolation but in the context of the DPD for the District as a whole - a process which is now being progressed.
- 17 Specifically the scale and nature of provision at Cranbrook should be finalised upon progression/completion of the Gypsy and Traveller DPD having regard to the range of alternative sites (including those emerging as part of the Council's call for gypsy and travellers sites and review of SHLAA sites), the means and strategy for delivery across the district, and the outcomes of consultations with gypsy and traveller and existing communities.



- 18 As a consequence, EDNCp consider that the wording of the policy that is proposed to be added to Strategy 12 by EDDC should be further amended as set out below.
- 19 Further minor amendment is also required to ensure consistency the wording of the SOCG on Development at Cranbrook (17 June 2015) which refers to a site or sites and not sites. Alternatively the policy might refer not to sites but simply to the need to make provision for a number of pitches ("up to 30").
- 20 Finally there is no basis for references to concurrent provision and early years. The references to "bricks and mortar" housing development are also unnecessary and inappropriate. Such references are not evidenced to be matters for policy. Timing of provision will be for appropriate subsequent agreements having regard to the wider provision coming forward.
- 21 The additional policy reference should be amended accordingly to address each of the above points and the Inspector is asked to advise accordingly:
"Subject to the Gypsy and Traveller DPD process and its evidence base, Provision will be made for a new gypsy and traveller site or sites to accommodate up to 30 pitches on land for the expansion of allocated for Cranbrook development. Provision will be required concurrently with (though in the early years of) the 'bricks and mortar' housing development of the allocated land".
- 22 With regard to the overall provision for gypsy and travellers in East Devon as set out in the GTAA EDNCP would be keen to ensure that the previous estimates of need do not need to be revisited as necessary to reflect the most recent definition of "traveller" as set out in the August 2015 Planning Policy for Traveller Sites (DCLG).

EDNCp trust that the above comments assist.

Yours sincerely



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