

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 see 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 7 Issue 10 Inspector’s Questions 106, 107, 108, 116

2.1 **Q106.** Our client confirms that:

- their land is available for the uses proposed;
- they’ve submitted a planning application which demonstrates that safe and appropriate access for vehicles and pedestrians can be provided (following detailed consultation with the Highways Authority) and (bolstered by detailed consultancy reporting) which is deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental and other constraints. (The application planning obligations draft Heads of Terms proposes a “roof tax”.)

2.2 **Q107.** Backed by detailed consultancy reporting, our client confirms that they have given full consideration to the impact of their proposed development on:

- access;
- landscape impacts (including in relation to coalescence);
- flood risk management and water quality;
- ecology;

and that their development could proceed without harm.

2.3 **Q108.** Our client’s LVIA (attached) shows that there would be no risk of settlement coalescence with Rockbeare. Our client endorses the Council’s conclusion that the land to the north east of Rockbeare village benefits from some existing vegetation and furthermore that this results in limited public views from the village out towards their land. As such our client strongly supports the Council’s view that it is considered that development can be accommodated within The Grange Expansion Area without it being visible from Rockbeare village, whilst still retaining adequate separation to prevent coalescence between settlements. Our client’s application reinforces these principles.

2.4 **Q116.** 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.

2.5 The Cranbrook Masterplan Layout as currently proposed shows C 200 houses obliterating ancient trees in a parkland setting and delivering C 5 Ha of SANGS and no internal open spaces. The submitted application layout shows 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.

2.6 Currently, there would be a significant impact on the Grange Parkland and its ancient trees/woodland. The application proposes a layout that would enable the retention of key parkland trees without impacts (including in relation to LVI and coalescence).

James McMurdo MRTPI MRICS

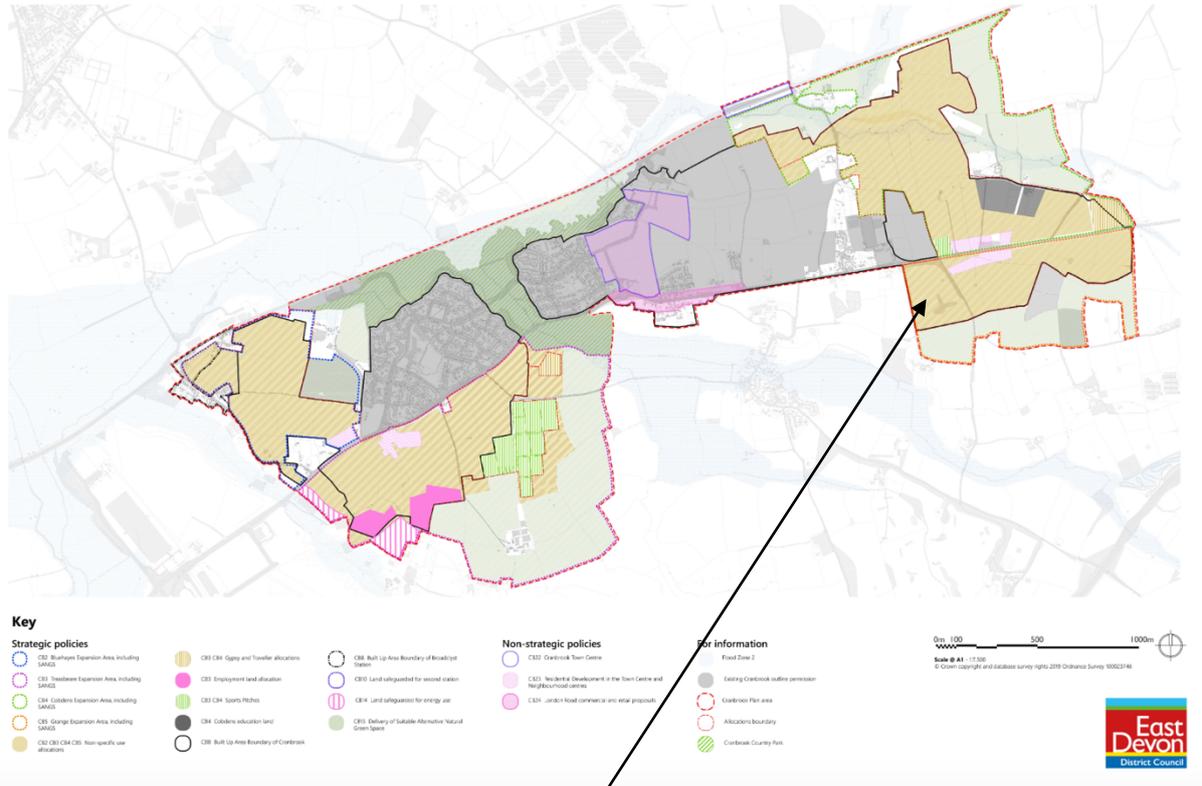
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Appendix 1

Cranbrook Plan - Policies Map



Site
URN 147;
EDDC Application Reference No 19/1798

Appendix 2: Illustrative Masterplan 19/1798/MOUT



Accommodation Schedule

Open Market (169 no. total)

2 Bed Flat	9 no.
2 Bed FOG	2 no.
2 Bed House	39 no.
3 Bed House (2 storey)	73 no.
3 Bed House (2.5 storey)	2 no.
4 Bed House (2 storey)	41 no.
4 Bed House (2.5 storey)	3 no.

Affordable Housing (30 no. total)

1 Bed Flat	12 no.
2 Bed House	12 no.
3 Bed House	6 no.

Open Space Comparison

	Cranbrook Masterplan	Rockbeare Proposals
On Site Public Open Space (ha)	2.84	6.37
SANGS Area (ha)	5	5
Total	7.84	11.37

REVISION	DATE	COMMENTS	AUTHOR / CHECKED
 architecture urbanism landscape			
Land at Rockbeare			TITLE
Revised Masterplan			DETAIL
LHC GROUP www.lhc.net		DATE 08/01/20	SCALE 1:2000 @A3/1:1000 @ A1
EXETER 01392 01752	44034 68008	DRAWING NO. 18130_SK01.06.01	REV AV / AS
DRAWING - STATUS FINAL			